

**VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT**

669 County Square Drive
Ventura, CA 93003
805/645-1400

PART 70 PERMIT

Number 00990

Permit Term: January 1, 2008 to December 31, 2012

Company Name / Address:

Aera Energy LLC
3382 North Ventura Avenue
Ventura, CA 93001-1237

Facility Name / Address:

Aera Energy LLC
Sespe Compressor Plant
Fillmore, CA 93015

Responsible Officials:

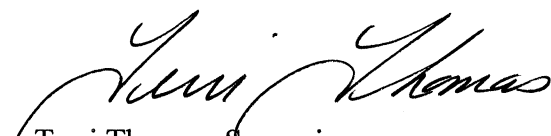
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Ventura, CA 93001-1237

The Part 70 permit consists of this page and the tables, attachments and conditions listed in the attached table of contents. The Part 70 permit application is included for reference only and is not a part of the Part 70 permit.

Pursuant to Rule 33.1, the Part 70 permit shall also serve as a permit to operate issued to fulfill the requirements of Rule 10.B.


Terri Thomas, Supervisor
Engineering Division

For:

Michael Villegas
Air Pollution Control Officer

January 23, 2008

PART 70 PERMIT NO. 00990
TABLE OF CONTENTS

1. Permit Cover Sheet
 - a. Permit Revisions Table
 - b. Permit Summary and Statement of Basis
 - c. Periodic Monitoring Summary
2. Permitted Equipment and Applicable Requirements Table
3. Permitted Throughput and Consumption Limit Table
4. Permitted Emissions Table
5. Oil Well List

Note: There are no permitted oil wells at this facility.

6. Exempt Equipment List
7. Specific Applicable Requirements (Attachments)
 - a. Rule 71.1, Crude Oil Production and Separation (71.1N1)
 - b. Rule 71.5, Glycol Dehydrators (71.5N1)
 - c. Rule 74.9, Stationary Internal Combustion Engines (74.9N3-00990)
Attachment includes 40 CFR Part 64, Compliance Assurance Monitoring
8. Permit Specific Conditions (Attachments)
 - a. General Recordkeeping Requirements (PO00990PC1)
 - b. Solvent Wipe Cleaning Additional Requirements (PO00990PC1)
 - c. Waste Gas Flare Additional Requirements (PO00990PC2)
 - d. Waukesha Compressor Engine Additional Requirements (PO00990PC3)
9. General Applicable Requirements (Attachments)
 - a. Rule 50, Opacity (50)
 - b. Rule 54.B.1, Sulfur Compounds - SO_x at Point of Discharge (54.B.1)
 - c. Rule 54.B.2, Sulfur Compounds - SO_x at or Beyond Property Line (54.B.2)
 - d. Rule 57.1, Particulate Matter Emissions From Fuel Burning Equipment (57.1)
 - e. Rule 64.B.1, Sulfur Content of Fuels - Gaseous Fuels (64.B.1)
 - f. Rule 71.1.C, Crude Oil Production and Separation - Produced Gas (71.1.C)

- g. Rule 71.4.B.1, First Stage Sump Prohibition (71.4.B.1)
- h. Rule 74.6, Surface Cleaning and Degreasing (74.6)
- i. Rule 74.10, Fugitive Emissions – Oilfields (74.10)
- j. Rule 74.11.1, Large Water Heaters and Small Boilers (74.11.1)
- k. Rule 74.22, Natural Gas-Fired Central Furnaces (74.22)

10. General Requirements for Short-Term Activities (Attachments)

- a. Rule 74.1, Abrasive Blasting (74.1)
- b. Rule 74.2, Architectural Coatings (74.2)
- c. Rule 74.4.D, Cutback Asphalt - Road Oil (74.4.D)
- d. 40 CFR Part 61 Subpart M - Asbestos NESHAP (40CFR61.M)

11. General Permit Conditions

- a. Part 70 Permit General Conditions (Part 70 General)
- b. Permit to Operate General Conditions (PO General)

12. Miscellaneous Federal Program Conditions

- a. 40 CFR Part 68 - Accidental Release Prevention and Risk Management Plans (40CFR68)
- b. 40 CFR Part 82 - Protection of Stratospheric Ozone (40CFR82)

13. Part 70 Permit Application Package

Note: The Part 70 permit application is included for reference only and is not a part of the Part 70 permit.

1.a. PERMIT REVISIONS

| Application No. | Issue Date | Description | Revised Permit Sections |
|-----------------|------------|---|---|
| 00990-ADM1 | 01/26/00 | Administrative Amendment to revise permitted emissions to reflect the use of standard calculation methods for natural gas engines and oil storage tanks | <ul style="list-style-type: none"> • Signature Cover Page • Table of Contents • Permit Revisions Table • Table No. 4 (Permitted Emissions) |
| 00990-161 | 06/29/00 | Administrative Amendment to change the Responsible Official and Title V Contact | <ul style="list-style-type: none"> • Signature Cover Page • Permit Revisions Table |
| 00990-171 | 01/13/03 | Permit Reissuance for Term: January 1, 2003 to December 31, 2007 | See "Stationary Source Description" |
| 00990-ADM2 | 02/05/04 | Administrative Amendment to revise permitted emissions to reflect updated emission factors for the glycol reboiler | <ul style="list-style-type: none"> • Signature Cover Page • Permit Revisions Table • Table No. 4 (Permitted Emissions) |
| 00990-181 | 09/02/04 | <p>Designate one of the 906 BHP Waukesha engines (S/N unknown) as Out of Service / Minor Part 70 Permit Modification.</p> <p>Removing Source test requirement for the gaseous fuel heating value.</p> | <ul style="list-style-type: none"> • Signature Cover Page • Permit Revisions Table • Periodic Monitoring Table. • Table No. 2 (Permitted Equipment and Applicable Requirements) • Table No. 3 (Permitted Throughput/Consumption Limits) • Table No. 4 (Permitted Emissions) • Attachment 74.9N3-00990 • Attachment PO00990PC3 |
| 00990-191 | 09/16/05 | Administrative Amendment to change the Responsible Official | <ul style="list-style-type: none"> • Signature Cover Page • Permit Revisions Table • Attachment 74.6(2003) <i>replaces Attachment 74.6(07/22/02)</i> |
| 00990-201 | | Permit Reissuance for Term January 1, 2008 to December 31, 2012 | See "Permit Summary and Statement of Basis" |

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1.b. PERMIT SUMMARY AND STATEMENT OF BASIS

Stationary Source Description

This stationary source is a natural gas compression facility known as the Sespe Compressor Plant. The source is owned and operated by Aera Energy LLC. This source has a Standard Industrial Classification (SIC) Code of 1311, Crude Oil Production. The source is located north of the city of Fillmore in the Los Padres National Forest. The permit includes three 906 BHP, natural gas-fired, rich-burn, internal combustion engines; a 262.5 MMBTU/Hr waste gas flare; a 105 bbl condensate tank; a glycol dehydration system; and solvent wipe cleaning. This stationary source is subject to the Part 70 permit program based upon the potential to emit carbon monoxide (CO).

The plant receives natural gas from oil fields in the Sespe area. The gas first enters a suction scrubber that removes some condensate. The gas then enters the compressors that are driven by the permitted engines. The gas is then routed either to the discharge scrubber and glycol dehydrator and shipped to Aera Energy's Ventura Avenue Gas Plant No. 7 for further processing or routed to a fuel-gas scrubber for additional liquid removal and used as fuel by the compressor engines and glycol reboiler.

As discussed in more detail throughout this Permit Summary and Statement of Basis, this permit applies to emissions units that are required to have a permit to operate pursuant to District Rule 10, "Permits Required", and District Rule 23, "Exemptions from Permit". These emissions units are listed in Table No. 2 in Section No. 2 of this permit. However, as discussed below, some equipment that is exempt from permit pursuant to District Rule 23, "Exemptions from Permit", may be subject to District rules such as District Rule 50, "Opacity". This includes "Insignificant Activities" as listed in Section No. 6 of the permit. In addition, "Short Term Activities" as listed in Section No. 10 of the permit are subject to certain rules and regulations. This permit does not regulate or restrict the use of motor vehicles and mobile equipment such as cars, trucks, bulldozers, and forklifts, however, any smoke or dust emissions generated from the use of such equipment is subject to District Rule 50, "Opacity". This permit does not shield the permittee from complying with any Federal, State, or District rule or regulation that is not specifically addressed in the permit or any rule or regulation that may come into effect during the term of the permit.

Stationary Source Emissions

In Ventura County, the Part 70 permit thresholds are 25 tons per year for ROC and NO_x and 100 tons per year for PM, SO_x, and CO as Ventura County is not in attainment with the federal ozone standard. This stationary source is subject to the Part 70 permit program based upon the potential to emit nitrogen oxides (NO_x) in excess of these thresholds as shown in Table No. 4 in Section No. 4 of this Permit to Operate. The purpose of Table No. 4 is to document the permitted emissions of the criteria pollutants ROC, NO_x, PM, SO_x, and CO for this stationary source.

District Rule 29, "Conditions on Permits", requires permitted emissions to be included on each Permit to Operate. District Rule 29 requires that annual permitted emissions be based on a 12 calendar month rolling period and be expressed in units of tons per year. Hourly permitted emissions are required to be expressed in units of pounds per hour. Permitted emissions for a stationary source are required to be determined by aggregating the permitted emissions for each emissions unit at the stationary source.

Criteria pollutant emissions (ROC, NO_x, PM, SO_x, and CO) result from the combustion of natural gas in the engines and glycol reboiler and waste gas in the flare. Reactive Organic Compound (ROC) emissions result from the condensate tank and the glycol dehydrator.

This stationary source is not a major source of federal Hazardous Air Pollutants (HAPs). The source is well below the HAP major source levels of 10 tons per year of a single HAP or 25 tons per year of combined HAPs. As an area (non-major) source of hazardous air pollutants, there are no Maximum Achievable Control Technology (MACT) standards that apply to this facility. The Part 70 Permit re-issuance application includes a summary (in the units of pounds per year and pounds per hour) of pollutants that are subject to the State of California AB2588 Air Toxics "Hot Spot" Program. All HAPS are subject to "Hot Spots" reporting. The goal of the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (California Health and Safety Code Section 44300) is to collect air toxics emission data, to identify facilities having localized adverse health impacts, to ascertain health risks, to notify nearby workers and residents of significant risks, and to reduce significant risks if they exist. Under state law, motor vehicles (on-road and off-road) are not subject to the "Hot Spots" program. This facility has been subject to the "Hot Spots" program since 1989. Based on the quantity of toxic air contaminants released from the facility as determined by source testing, material balance calculations, and other engineering estimates, the potency and toxicity of materials released, and the proximity to sensitive receptors, this facility has been classified as "low level". As a low level facility, the stationary source is exempt from toxics reporting requirements unless any changes are made; such as facility changes, receptor changes, or toxicity calculation changes, which would put the facility in the "intermediate" category. The most recent data submitted was for the calendar year 2003.

Compliance History

Upon reissuance of this Part 70 permit, the facility was determined to be in compliance with all applicable requirements. For the time period October 1, 1996 to November 7, 2007, the facility received three (3) Notices of Violation (NOV) as detailed in the "NOV by Facility" history for Facility No. 00990 located at the end of this section of the Part 70 permit.

Equipment Description and Applicable Requirements - General

Applicable requirements for this stationary source are listed throughout the permit. The Table of Contents in the front of the permit summarizes the applicable requirements including the

equipment specific requirements, the general applicable requirements, and the applicable requirements for short-term activities. Table No. 2 in Section No. 2 of this Permit to Operate details the applicable requirements for specific emissions units at the facility. Permit conditions that enforce these requirements are listed in Section No. 7, "Specific Applicable Requirements" and Section No. 8, "Permit Specific Conditions" of this permit.

In addition to the emission unit specific requirements in Section No. 7 and Section No. 8, there are additional general requirements that may apply to the emissions units listed in this table, or to the stationary source as a whole. Furthermore, some general requirements may apply to emissions units or short-term activities not required to be specifically listed on the permit. These general requirements are contained in the following sections of the Permit: Section No. 9, "General Applicable Requirements"; Section No. 10, "General Requirements for Short-Term Activities"; Section No. 11, "General Permit Conditions"; and Section No. 12, "Miscellaneous Federal Program Conditions". A detailed applicability discussion and additional legal basis for the permit condition(s) is included with each attachment or set of permit conditions.

Equipment Description and Applicable Requirements - Specific

The three natural gas-fired, rich-burn Waukesha engines are all equipped with non-selective catalytic reduction for NOx control in order to comply with Rule 74.9, "Stationary Internal Combustion Engines". The rule has ROC, NOx, and CO emission limits and requires a quarterly NOx and CO screening analysis and biennial source testing. These engines are also required to comply with 40 CFR Part 64, "Compliance Assurance Monitoring" (CAM). A CAM plan has been submitted with the Part 70 permit reissuance application and is included in this permit. One of the engines is listed on the permit as "Out of Service" and is required to remain disconnected from the fuel source. The "Out of Service" engine is not required to conduct the quarterly screening analysis, the biennial source test, or the daily CAM requirements.

The 105 bbl condensate tank is equipped with vapor recovery in order to comply with Rule 71.1, "Crude Oil Production and Separation". The glycol dehydrator system is subject to Rule 71.5, "Glycol Dehydrators". The dehydrator vent stack is connected to the vapor recovery system. The 262.5 MMBTU/Hr waste gas flare is used if there is an upset at the compressor plant.

This stationary source is subject to the fugitive leak and inspection requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".

This stationary source has stated that 40 CFR Part 68, "Chemical Accident Prevention Provisions", is not an applicable requirement. Therefore, a federal Risk Management Plan, pursuant to section 112(r) of the federal Clean Air Act as amended, is not required.

Permit Revisions Summary

The Permit Revisions Table (located in Section No. 1 of the permit) is a list of all permit revisions since Part 70 Permit No. 00990 was initially issued on January 1, 1998. A detailed list of a portion of the permit revisions is described below. The District's Engineering Analysis for each application can also be consulted for further details.

Application No. 00990-171: Application No. 00990-171 is for the reissuance of Part 70 Permit No. 00990 for the period January 1, 2003 to December 31, 2007. The following items summarize the changes from the initial Part 70 Permit No. 00990 (January 1, 1998 to December 31, 2002):

- An additional Responsible Official for Aera Energy LLC has been added to the permit.
- The "Stationary Source Description" has been added to the permit. It was not included in the initial Part 70 Permit No. 00990.
- A Compliance Assurance Monitoring (CAM) plan, pursuant to 40 CFR Part 64, for the three 906 BHP internal combustion engines has been included.
- Attachments detailing the applicable requirements for Rule 74.11.1, "Large Water Heaters and Small Boilers", and Rule 74.22, "Natural Gas-Fired Central Furnaces", have been added to the permit.
- The following District rules have been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the initial issuance of Part 70 Permit No. 00990:
 - a) Rule 54, "Sulfur Compounds"
 - b) Rule 57, "Combustion Contaminants – Specific"
 - c) Rule 64, "Sulfur Content of Fuels"
 - d) Rule 68, "Carbon Monoxide"
 - e) Rule 74.1, "Abrasive Blasting"
 - f) Rule 74.2, "Architectural Coatings"
 - g) Rule 74.6, "Surface Cleaning and Degreasing"
 - h) Rule 74.9, "Stationary Internal Combustion Engines"
 - i) Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"

Application No. 00990-201: Application No. 00990-201 is for the reissuance of Part 70 Permit No. 00990 for the period January 1, 2008 to December 31, 2012. The following items summarize the revisions to the permit since the January 1, 2003 to December 31, 2007 reissuance:

- The Responsible Official address has been changed.
- The Permit Summary and Statement of Basis for the permit has been expanded.
- The wipecleaning operation has been removed from the permit due to changes in Rule 23, "Exemptions From Permit". Wipecleaning is now listed in the Insignificant Activities

Table. Rule 74.6, "Surface Cleaning and Degreasing", will remain part of the permit in the "General Requirements" section.

- The following District rules have been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the last reissuance of Part 70 Permit No. 00990:
 - a) Rule 23, "Exemptions From Permit"
 - b) Rule 50, "Opacity"
 - c) Rule 52, "Particulate Matter – Concentration (Grain Loading)" – The rule was revised such that it no longer applies to the emissions units at this stationary source.
 - d) Rule 57, "Combustion Contaminants – Specific" – The rule has been replaced by Rule 57.1, "Particulate Matter Emissions From Fuel Burning Equipment"
 - e) Rule 68, "Carbon Monoxide" – The rule was revised such that it no longer applies to the emissions units at this stationary source.
 - f) Rule 74.2, "Architectural Coatings"
 - g) Rule 74.6, "Surface Cleaning and Degreasing"
 - h) Rule 74.9, "Stationary Internal Combustion Engines"

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NOV by Facility

Since January 1, 1996

| Facility No | 00990 | Aera Energy LLC | | | |
|------------------|--------|-----------------|---|-------------|-------------|
| NOV Date | NOV No | Rule Number | Comment | Settlement | Date Closed |
| 02/20/2003 | 020142 | 71.1.B.1 | Improper Vapor Recovery System - Tank Battery | \$3,000.00 | 04/08/2003 |
| 08/17/2005 | 021116 | 29.C | Permit Condition Not Met - Oilfield | \$3,500.00 | 10/20/2005 |
| 05/18/2006 | 021566 | 74.9 | Excess NOx Emissions - I.C. Engine | \$4,000.00 | 08/31/2006 |
| Total for 3 NOVs | | | | \$10,500.00 | |

1.c. PERIODIC MONITORING SUMMARY

This periodic monitoring summary is intended to aid the permittee in quickly identifying key monitoring, recordkeeping, and reporting requirements. It is not intended to be used as a “stand alone” monitoring guidance document that completely satisfies the requirements specifically applicable to this facility. The following tables are included in the periodic monitoring summary:

- Table 1.c.1 - Specific Applicable Requirements
- Table 1.c.2 - Permit-Specific Conditions
- Table 1.c.3 - General Applicable Requirements
- Table 1.c.4 - General Requirements for Short-Term Activities

1.c.1. Specific Applicable Requirements

The Specific Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 7 of this permit.

| Attachment No./Condition No. | Applicable Rule or Requirement | Monitoring | Recordkeeping | Semi-annual Reports | Test Methods |
|------------------------------|---|--|--|---|---|
| 71.1N1 | Rules 71.1.B.1.a, 74.10 | <ul style="list-style-type: none"> •Quarterly inspection of the following components for proper operation: gas compressor, hatches, relief valves, pressure regulators, flare, as applicable •Verbal notice of maintenance activities •Rule 74.10 inspections •Annual compliance certification including verification that tanks are equipped with a vapor recovery system | <ul style="list-style-type: none"> •Records of quarterly inspections and tank maintenance activities •Rule 74.10 records | None | None |
| 71.5N1 | Rules 71.5.B.1.a.1, 71.5.B.2, 71.5.B.3, 71, 71.1, and 74.10 | <ul style="list-style-type: none"> •Rule 74.10 inspections •Annual compliance certification including visual inspection to ensure system is closed and leak free | <ul style="list-style-type: none"> •Records of visual inspections •Records of current glycol dehydrator information •Rule 74.10 records | None | Gas Leak - EPA Method 21, Appendix A |
| 74.9N3-00990 | Rules 74.9.B.1, B.2 and 40 CFR Part 64 (CAM) | <ul style="list-style-type: none"> •Quarterly screening analysis •Biennial source test (ROC, NO_x, CO) •Annual compliance certification •Daily measure NO_x concentration with portable analyzer (CAM) | <ul style="list-style-type: none"> •Records of inspections •Records of maintenance •Records of daily portable NO_x analyzer readings (ppmvd at 15% oxygen), time of measurement, excursions noted, corrective actions noted (CAM) | <ul style="list-style-type: none"> •Actual annual usage •Summary of maintenance and testing •Biennial source test report •Number, duration, and cause of CAM excursions and corrective action taken | <ul style="list-style-type: none"> •ROC-EPA Method 25 or EPA Method 18 •NO_x-ARB Method 100 •CO-ARB Method 100 |

1.c.2. Permit-Specific Conditions

The Permit-Specific Conditions Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 8 of this permit.

| Attachment No./Condition No. | Applicable Rule or Requirement | Monitoring | Recordkeeping | Semi-annual Reports | Test Methods | Comments |
|------------------------------|--|---|---|---------------------|--------------|----------|
| PO0990PC1 - Condition No. 1 | Rules 26 and 29 General Recordkeeping | <ul style="list-style-type: none"> •Annual compliance certification •Monthly records of throughput and consumption | <ul style="list-style-type: none"> •Monthly records | None | None | |
| PO0990PC1 - Condition No. 2 | Rule 29 Exempt Solvents | <ul style="list-style-type: none"> •Maintain a list of solvents in use and permit exemption status | None | None | None | |
| PO0990PC2 | Rule 26 Flare Occurrences and Fuel Consumption | <ul style="list-style-type: none"> •Date, duration, and reason for occurrence •Fuel consumption •Identify emergency vs. non-emergency usage •Annual compliance certification | <ul style="list-style-type: none"> •Records of dates, durations, and reasons for flaring •Monthly records of fuel consumption | None | None | |
| PO0990PC3 | Rules 29 and 74.9 Compressor Engine Operations | <ul style="list-style-type: none"> •Annual compliance certification to ensure operating compressor engines do not exceed 900 revs/min •Annual compliance certification to ensure that any engine designated as "Out of Service" is shut down, is not being operated, and is not connected to a fuel source. | None | None | None | |

1.c.3. General Applicable Requirements

The General Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 9 of this permit.

| Attachment No./ Condition No. | Applicable Rule or Requirement | Monitoring | Recordkeeping | Semi-annual Reports | Test Methods | Comments |
|----------------------------------|-----------------------------------|--|--|---------------------|---|---|
| 50 | Rule 50 | <ul style="list-style-type: none"> • Routine surveillance • Visual inspections • Annual compliance certification, including a formal survey • Opacity readings upon request • Notification required for uncorrectable visible emissions | <ul style="list-style-type: none"> • All occurrences of visible emissions for periods > 3 min in any one hour • Annual formal survey of all emissions units | None | <ul style="list-style-type: none"> • Opacity - EPA Method 9 | |
| 54.B.1 | Rule 54.B.1 | <ul style="list-style-type: none"> • Annual compliance certification • Follow monitoring requirements under Rule 64 • Upon request, source test for sulfur compounds at point of discharge | None | None | <ul style="list-style-type: none"> • Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94, as appropriate | <ul style="list-style-type: none"> • Compliance with Rule 64 ensures compliance with this rule based on District analysis |
| 54.B.2 | Rule 54.B.2 | <ul style="list-style-type: none"> • Annual compliance certification • Determine ground or sea level concentrations of SO₂, upon request | <ul style="list-style-type: none"> • Representative fuel analysis or exhaust analysis and compliance demonstration | None | <ul style="list-style-type: none"> • SO₂ - BAAQMD Manual of Procedures, Vol. VI, Section 1, Ground Level Monitoring for H₂S and SO₂ | |
| 57.1 | Rule 57.1 | <ul style="list-style-type: none"> • Annual compliance certification | None | None | None | <ul style="list-style-type: none"> • Not required based on District analysis |
| 64.B.1 | Rule 64.B.1 | <ul style="list-style-type: none"> • Annual compliance certification • None for PUC-quality gas • Annual test for non PUC-quality gas (submit with annual compliance certification) | <ul style="list-style-type: none"> • Annual fuel gas analysis for non PUC-quality gas | None | <ul style="list-style-type: none"> • SCAQMD Method 307-94 | |
| 71.1.C | Rules 71.1.C and 74.10 | <ul style="list-style-type: none"> • Annual compliance certification • Rule 74.10 inspections • Visual inspection to ensure collection system is closed • Quarterly inspection of flare to ensure proper operation | <ul style="list-style-type: none"> • Records of inspections of flare • Rule 74.10 records | None | None | <ul style="list-style-type: none"> • Compliance with Rule 74.10 ensures compliance with the gas collection system's maintenance requirements |

1.c.3. General Applicable Requirements (Continued)

| Attachment No./ Condition No. | Applicable Rule or Requirement | Monitoring | Recordkeeping | Semi-annual Reports | Test Methods | Comments |
|----------------------------------|-----------------------------------|--|---|---------------------|--|---|
| 71.4.B.1 | Rule 71.4.B.1 | <ul style="list-style-type: none"> • Annual compliance certification to ensure there are no first stage sumps | None | None | None | |
| 74.6 | Rule 74.6 | <ul style="list-style-type: none"> • Annual compliance certification • Maintain current solvent information • Routine surveillance of solvent cleaning activities • Upon request, solvent testing | <ul style="list-style-type: none"> • Records of current solvent information | None | <ul style="list-style-type: none"> • ROC content-EPA Test Method 24 or 24A • Identity of solvent components-ASTM E168-67, ASTM E169-87, or ASTM E260-85 • True vapor pressure or composite partial pressure -ASTM D2879-86 • Initial boiling point-ASTM 1078-78 or published source • Spray gun active/passive solvent losses-SCAQMD Method (10-3-89) | |
| 74.10 | Rule 74.10 | <ul style="list-style-type: none"> • Annual compliance certification • Identify leaking components • Inspections every shift or 8 hours at natural gas processing plants • Daily and/or weekly inspections for specified equipment • Quarterly inspections for specified components • Pressure relief valve inspections • Annual update to Operator Management Plan • Notification of major leaks in critical components • Notification of repeat leaks | <ul style="list-style-type: none"> • Records of leak inspections in inspection log | None | <ul style="list-style-type: none"> • Gas Leaks - EPA Method 21 • ROC Concentration of Gas Streams - ASTM E168-88, ASTM E169-87, or ASTM E260-85 • Weight percentage of evaporated compounds of liquids - ASTM Method D 86-82 • API Gravity - ASTM Method D287 | |
| 74.11.1 | Rule 74.11.1 | <ul style="list-style-type: none"> • Annual Compliance Certification • Maintain identification records of large water heaters and small boilers | <ul style="list-style-type: none"> • Current large water heater and small boiler information | None | None | <ul style="list-style-type: none"> • Rule only applies to future installation of large water heaters and small boilers |
| 74.22 | Rule 74.22 | <ul style="list-style-type: none"> • Annual Compliance Certification • Maintain furnace identification records | <ul style="list-style-type: none"> • Current furnace information | None | None | <ul style="list-style-type: none"> • Rule only applies to future installation of natural gas-fired, fan-type furnaces |

1.c.4. General Requirements for Short-Term Activities

The General Requirements for Short-Term Activities Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 10 of this permit.

| Attachment No./ Condition No. | Applicable Rule or Requirement | Monitoring | Recordkeeping | Semi-annual Reports | Test Methods | Comments |
|----------------------------------|-----------------------------------|--|---|--|---|----------|
| 74.1 | Rule 74.1 | <ul style="list-style-type: none"> • Annual compliance certification • Routine surveillance and visual inspections of abrasive blasting operation • Abrasive blasting records | <ul style="list-style-type: none"> • Abrasive blasting records | None | <ul style="list-style-type: none"> • Visible emission evaluation-Section 92400 of CCR | |
| 74.2 | Rule 74.2 | <ul style="list-style-type: none"> • Annual compliance certification • Routine surveillance • Maintain VOC records of coatings used | <ul style="list-style-type: none"> • Maintain VOC records of coatings used | None | <ul style="list-style-type: none"> • VOC content-EPA Method 24, CARB Method 432 • Acid content-ASTM Method D 1613-85, • Metal content-SCAQMD Method 311-91 | |
| 74.4.D | Rule 74.4.D | <ul style="list-style-type: none"> • Annual compliance certification • Test ROC content of oil sample being proposed for usage | <ul style="list-style-type: none"> • Records of oil analyses | None | <ul style="list-style-type: none"> • ASTM D402 | |
| 40CFR.61.M | 40 CFR Part 61, Subpart M | <ul style="list-style-type: none"> • Annual compliance certification • See 40 CFR Part 61.145 for inspection procedures | <ul style="list-style-type: none"> • See 40 CFR Part 61.145 for recordkeeping procedures | <ul style="list-style-type: none"> • See 40 CFR Part 61.145 for notification procedures | <ul style="list-style-type: none"> • See 40 CFR Part 61.145 for test methods | |

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2. PERMITTED EQUIPMENT AND APPLICABLE REQUIREMENTS TABLE

Purpose

The purpose of this table is to list the emissions units at this stationary source that are permitted to operate pursuant to Rule 10, "Permits Required" and Rule 23, "Exemptions From Permit". The table also provides a list of requirements that are specifically applicable to these emissions units. Permit conditions that enforce these requirements are listed in Section No. 7, "Specific Applicable Requirements" and Section No. 8, "Permit Specific Conditions" of this permit.

In addition to the emission unit specific requirements in Section No. 7 and Section No. 8, there are additional general requirements that may apply to the emissions units listed in this table, or to the stationary source as a whole. Furthermore, some general requirements may apply to emissions units or short-term activities not required to be specifically listed on the permit. These general requirements are contained in the following sections of the Permit: Section No. 9, "General Applicable Requirements"; Section No. 10, "General Requirements for Short-Term Activities"; Section No. 11, "General Permit Conditions"; and Section No. 12, "Miscellaneous Federal Program Conditions".

Equipment Description

This portion of the table provides a brief description of the permitted equipment at this stationary source. Attached to the table is a "Title V Equipment List Description Key" that contains definitions and explanations for some of the standard terminology used in the equipment description.

Applicable Requirements

The applicable requirements portion of the table is a matrix of applicability for the specific requirements that apply to the listed emissions units. The columns are labeled with APCD rule numbers or references to federal requirements. An "X" in the row corresponding to the emissions unit indicates the requirement is specifically applicable to that unit. For cases where a rule has multiple compliance options, a number appears instead of an "X". The number is a code key that corresponds to the "Title V Applicable Requirement Code Key" attached to the table. The code key table contains specific citations for the portions of the rule that are applicable. The code key is also used to identify the permit attachment in Section No. 7, "Specific Applicable Requirements", that contains the associated permit conditions. For example, code key "1" under Rule 71.1 is associated with Attachment 71.1N1 in Section No. 7.

Permit specific conditions are identified with a "PC" followed by a number in the column labeled "ADD REQ" (additional requirements). A "PC#" in the row corresponding to the emissions unit indicates that the permit specific condition is specifically applicable to that unit. The "PC#" also

corresponds to the permit attachment in Section No. 8, "Permit Specific Conditions", that contains the permit specific requirements.

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TABLE NO. 2

| VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT Permit to Operate No. 00990 Permitted Equipment and Applicable Requirements | | | | |
|--|------|------|--------|--|
| <small>M:\Title\TV permits\PO0990\Permit III\00990-201-Tables 2,3 & 4.xls</small> Equipment | 71.1 | 71.5 | 74.9 | Additional Requirements |
| Sespe Compressor Plant 1 - 906 BHP Rich Burn Waukesha NG Engine (SN 17230) NSCR 1 - 906 BHP Rich Burn Waukesha NG Engine (SN 192297) NSCR 1 - 906 BHP Rich Burn Waukesha NG Engine (Unknown) OOS* 1 - 262.5 MMBTU/Hr Mactronic Waste Gas Flare 1 - 105 BBL Condensate Tank (T-101) VR 1 - Glycol Dehydrator System consisting of: 1 - Glycol Dehydrator Vent VR 1 - 0.5 MMBTU/HR NG Glycol Reboiler UNC | 1 | 1 | 3 3 | PC1, PC3 PC1, PC3 PC1, PC3 PC1,PC2 PC1 |
| * OOS = Out of Service | | | | |

TITLE V EQUIPMENT LIST DESCRIPTION KEY

For Title V permits, the Permitted Equipment and Applicable Requirements Table contains a number of terms, abbreviations, and acronyms that have been standardized for oilfield facilities. The following list describes many of the terms on an oilfield equipment list:

BHP The output of an internal combustion engine as measured in brake horsepower.

BL A crude oil loading facility that is equipped with bottom loading capabilities.

Condensate Tank A tank that is used for the purpose of storing water and hydrocarbon liquids recovered from natural gas scrubbers. This tank is assumed to operate with a variable liquid level and has an associated throughput limit.

COST A crude oil storage tank that generally operates with a variable liquid level and has an associated throughput limit. An oil shipping tank that has a truck loading rack is a COST by definition. These tanks may also be known as shipping tanks.

Cover Indicates that a petroleum sump, pit, or pond is equipped with a properly installed and maintained cover which complies with Rule 71.4.

EXEMPT A tank, pit, or sump that processes produced water with an ROC content of less than 5 milligrams per liter and is exempt from Rule 71.1 or Rule 71.4.

Gauge or Test Tank A tank that is used for the purpose of production testing a well or group of wells. This tank is assumed to operate with a variable liquid level and has an associated throughput limit.

LACT Tank A Lease Automated Custody Transfer tank that operates at a constant or near constant liquid level and does not have an associated throughput limit. This tank is generally equipped with a LACT pump for pipeline oil shipping. A shipping tank with a truck loading rack is not by definition a LACT tank, but is a COST.

Loading Facility A crude oil loading rack or loading valve used for the transfer of crude oil from a storage tank or group of tanks to a delivery vessel.

Lo-NOx Device has equipment to control the emissions of NOx and CO to meet the requirements of Rules 74.15 or 74.15.1, or best available control technology requirements.

MMBTU/Hr The heat input of an external combustion device as measured in millions of British Thermal Units per hour.

NG Indicates that the equipment is permitted to be fired on natural gas only.

NG/FO Indicates that equipment is permitted to be fired on natural gas with fuel oil or diesel as a backup fuel.

NSCR Engine that is equipped with non-selective catalytic reduction to meet its Rule 74.9 compliance requirements.

Pit Device used to receive emergency or intermittent flows.

PSC Engine that is equipped with a pre-stratified charge to meet its Rule 74.9 compliance requirements.

PWT A produced water tank that generally operates with a constant liquid level and does not have an associated throughput limit. These tanks may also be known as free water knock out (FWKO) tanks.

Rich Burn or Lean Burn A designation associated with a gas-fired internal combustion engine that determines its Rule 74.9 compliance requirements.

SCR Engine or turbine that is equipped with selective catalytic reduction and ammonia injection to meet its Rule 74.9 or Rule 74.23 compliance requirements.

SF A crude oil loading facility that is equipped with submerged fill loading capabilities.

Sump Device used for separation, generally in constant use.

UNC Indicates that the equipment is uncontrolled. For example, a tank that is not equipped with a vapor recovery system, or an engine or heater that is not equipped with NO_x controls are labeled UNC.

VR A vapor recovery system that is installed on a tank, loading rack or loading facility, glycol dehydrator, or other piece of process equipment.

Wash Tank A tank that stores and separates oil and water that generally operates with a constant liquid level. It does not have an associated throughput limit.

TITLE V APPLICABLE REQUIREMENT CODE KEY

Rule 71.1, "Crude Oil Production and Separation"

1. Storage tanks shall be equipped with a vapor recovery system that directs all vapors to a gas gathering system or flare (71.1.B.1.a)
2. Storage tanks shall be equipped with a vapor recovery system that directs all vapors to some other control system with a minimum destruction or removal efficiency of 90% by weight (71.1.B.1.b)
3. Tank batteries installed prior to June 20, 1978 are exempt from vapor recovery when processing crude oil having a modified Reid vapor pressure of less than 0.5 psia. Solid roof and pressure-vacuum relief valve is required. (71.1.B.2/71.1.D.1.a)
4. Storage tanks are exempt from the solid roof and vapor recovery requirements if the ROC content of the liquid entering the tank is less than 5 milligrams per liter. (71.1.D.3)
5. Storage tanks are exempt from the solid roof and vapor recovery requirements if a BACT Cost Analysis indicates that maximum emission reduction has already taken place. (71.1.D.4)
6. Portable tanks shall be equipped with closed covers and pressure vacuum valves and have limited exemptions from vapor recovery requirements. (71.1.B.3/71.1.D.1.c)

Rule 71.5, "Glycol Dehydrators"

1. Requirement to have a condenser or separator system which directs vapors to a fuel gas or sales gas system. (71.5.B.1.a.1) Requirement to prevent hydrocarbon liquid evaporation and control system leaks. (71.5.B.2 and 71.5.B.3)
2. Requirement to have a condenser or separator system which directs vapors to a flare, incinerator, thermal oxidizer or reboiler. (71.5.B.1.a.2) Operation requirements for flare or incinerator. (71.5.B.1.b) Requirement to prevent hydrocarbon liquid evaporation and control system leaks. (71.5.B.2 and 71.5.B.3)
3. Requirement to have a condenser or separator system which directs vapors to another 95% control system. (71.5.B.1.a.3) Requirement to prevent hydrocarbon liquid evaporation and control system leaks. (71.5.B.2 and 71.5.B.3)
4. Requirement to have any other control system with a 95% control efficiency or which meets an emission limit of 1.7 lb ROC per MMSCF of gas dehydrated. (71.5.B.1.c) Requirement to prevent hydrocarbon liquid evaporation and control system leaks. (71.5.B.2 and 71.5.B.3)
5. Exemption from the control requirements of Rule 71.5 for unit that is operated less than 200 hours per year. (71.5.C)

Rule 74.9, "Stationary Internal Combustion Engines"

1. Pre-January 1, 2002 emission limits and post-January 1, 2002 emission limits for natural gas rich burn engines with existing emission controls installed after September 5, 1989. (74.9.B.1 or 74.9.B.2, and 74.9.B.3)

2. Pre-January 1, 2002 emission limits and post-January 1, 2002 emission limits for natural gas lean burn engines with existing emission controls installed after September 5, 1989. (74.9.B.1 or 74.9.B.2, and 74.9.B.3)
3. Post-January 1, 1997 emission limits for natural gas rich burn engines with emission controls installed before September 5, 1989; or installed after March 5, 1992. (74.9.B.1 or 74.9.B.2)
4. Post-January 1, 1997 emission limits for natural gas lean burn engines with emission controls installed before September 5, 1989; or installed after March 5, 1992. (74.9.B.1 or 74.9.B.2) Post-January 1, 1997 emission limit for ammonia, if applicable. (74.9.B.5)
5. Post-January 1, 1997 emission limits for diesel engines. (74.9.B.1 or 74.9.B.2) Post-January 1, 1997 emission limit for ammonia, if applicable. (74.9.B.5)
6. Exemption from Rule 74.9 for engines operated less than 200 hours per calendar year (74.9.D.2)
7. Exemption from Rule 74.9 for emergency standby engines operated during either an emergency or maintenance operation. (74.9.D.3)
8. Exemption from Rule 74.9 for diesel engines with a permitted capacity factor of less than or equal to 15%. (74.9.D.8)
9. Exemption from Rule 74.9 for diesel engines used to power cranes and welding equipment. (74.9.D.9)

3. PERMITTED THROUGHPUT AND CONSUMPTION LIMIT TABLE

Purpose

The purpose of this table is to list the emissions units at this stationary source that have limitations on throughput, fuel consumption, raw material usage, hours of operation, or other parameters that limit the potential to emit of the emissions unit. In some cases, the limit on the potential to emit is expressed directly as a set of pollutants and emission limits in tons per year.

These limitations are applied pursuant to Rule 26, "New Source Review" or Rule 29, "Conditions on Permits". Two sets of limits are listed in this table. The "Throughput Permit Limit" is the enforceable limit pursuant to this permit. Permit conditions that enforce these limits are listed in Section No. 8, "Permit Specific Conditions" of this permit.

The "Calculation Throughput" is used only to calculate permitted emissions pursuant to Rule 29, "Conditions on Permits".

Equipment Description

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table".

Throughput Permit Limit

The throughput or consumption limit listed in this column of the table is an enforceable limit on the emissions unit's potential to emit. In the column labeled "District (D)/ Federal (F) Enforceable", a "D" or an "F" denotes whether the limit is only enforceable by the District or whether the limit is a federally-enforceable limit. District-enforceable limits are limits applied solely pursuant to Rule 29, "Conditions on Permits". Limits that have been applied pursuant to Rule 26, "New Source Review" are federally enforceable.

The throughput permit limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the throughput permit limit column.

Pursuant to Rule 26 and Rule 29, the throughput permit limit is an annual limit which is enforceable based on a period of any twelve (12) consecutive calendar months.

Note that when the calculation throughput (discussed below) corresponds to using the emissions unit full time (8760 hours per year) at maximum rated capacity, the throughput permit limit column contains the notation "No Limit". When District emission calculation procedures do not involve throughput or consumption data, both the throughput permit limit and the calculation throughput

column are left blank.

Calculation Throughput

The throughput or consumption limit listed in this column of the table is the throughput used in the District calculation procedures to calculate permitted emissions for the emissions unit. The calculation throughput may apply to a single emissions unit or to a set of emissions units denoted as discussed above. The calculation throughput is not an enforceable permit limit.

The "Calculation Procedure" column is reserved for future use. Emission calculations for the emissions units in this table are available in the District's permit files for this stationary source.

Abbreviations

The following abbreviations have been used in the "Permitted Throughput and Consumption Limit Table" for the "Throughput Permit Limit" column and for the "Calculation Throughput Limit" column:

BBL/Yr: barrels per year

Days/Yr: days per year

FO: fuel oil or diesel fuel

Gal/Yr: gallons per year

Hrs/Day: hours per day

Hrs/Yr: hours per year

Lbs ROC/Yr: pounds of reactive organic compounds per year

LPG: liquid petroleum gas (propane)

MBBL/Yr: thousands of barrels per year

MGal/Yr: thousands of gallons per year

MMBTU/Yr: million British Thermal Units of heat input per year

MMCF/Yr: million standard cubic feet of natural gas per year

MMGal/Yr: million gallons per year

NG: natural gas

TPY: tons per year

TABLE NO. 3

| VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT Permit to Operate No. 00990 Permitted Throughput/Consumption Limits | | | | |
|--|-------------------------------|--|---------------------------|--------------------------|
| M:\T\Title V\TV permits\PO0990\Permit III\00990-201-Tables 2,3 & 4.xls | Throughput Permit Limit | District (D)/ Federal(F) Enforceable | Calculation Throughput | Calculation Procedure |
| Sespe Compressor Plant | | | | |
| 1 - 906 BHP Waukesha NG Engine (SN 17230) NSCR | 127.8 MMCF/Yr * | D | 43.6 MMCF/Yr | |
| 1 - 906 BHP Waukesha NG Engine (SN 192297) NSCR | * | D | 42.6 MMCF/Yr | |
| 1 - 906 BHP Waukesha NG Engine (Unknown) OOS * | * | D | 41.6 MMCF/Yr | |
| 1 - 262.5 MMBTU/Hr Mactronic Waste Gas Flare | 234.0 MMCF/Yr | F | 234.0 MMCF/Yr | |
| 1 - 105 BBL Condensate Tank (T-101) VR | 9,100 BBL/Yr | D | 9,100 BBL/Yr | |
| 1 - Glycol Dehydrator System consisting of: | | | | |
| 1 - Glycol Dehydrator Vent VR | No Limit | | 8760 Hr/Yr | |
| 1 - 0.5 MMBTU/HR NG Glycol Reboiler UNC | No Limit | | 4.2 MMCF/Yr | |
| * Natural gas limit is 127.8 MMCF/Yr for the combined use of all three (3) engines, including Out of Service (OOS) Engine | | | | |

4. PERMITTED EMISSIONS TABLE

Purpose

The purpose of this table is to document the permitted emissions for this stationary source. Rule 29, "Conditions on Permits", requires permitted emissions to be included on each Permit to Operate. Rule 29 is not federally enforceable.

The permitted emissions table also characterizes the amount and type of criteria air pollutants emitted by this stationary source.

Rule 29 requires that annual permitted emissions be based on a 12 calendar month rolling period and be expressed in units of tons per year. Hourly permitted emissions are required to be expressed in units of pounds per hour. Permitted emissions for a stationary source are required to be determined by aggregating the permitted emissions for each emissions unit at the stationary source.

In general, permitted emissions are calculated based on throughput or consumption data for an emission unit, specific physical characteristics of the emission unit, and emission factors. The emission factors may be standard published emission factors or they may be derived from source test data or specific emission limits that apply to the emissions unit. In some cases, permitted emissions are expressed directly as a set of pollutants and emission limits in tons per year without reference to any calculation method.

Section No. 3, "Permitted Throughput and Consumption Limit Table", contains information on the throughput and consumption limits that are enforceable at this stationary source. In addition, other sections of this permit contain conditions that act to enforce specific portions of the permitted emissions table.

Equipment Description

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table".

Tons Per Year

This column of the table represents the permitted emissions in units of tons per year for ROC (reactive organic compounds), NO_x (nitrogen oxides), PM (particulate matter), SO_x (sulfur oxides), and CO (carbon monoxide). In some cases, emissions of non-criteria pollutants of interest may also be listed. Pursuant to Rule 29, annual permitted emissions shall be the annual emissions used to determine compliance for issuance of any new or revised permit issued after October 22, 1991. For emissions units for which no new or revised permit has been issued since

October 22, 1991, annual permitted emissions generally reflect actual historical emissions from the emissions unit.

The permitted emissions limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the pollutant columns.

Pounds Per Hour

This column of the table represents the permitted emissions in units of pounds per hour for ROC (reactive organic compounds), NO_x (nitrogen oxides), PM (particulate matter), SO_x (sulfur oxides), and CO (carbon monoxide). Pursuant to Rule 29, hourly permitted emissions shall be calculated based on the maximum quantity of each air pollutant which may be emitted from the emissions unit during a one hour period, as limited by any applicable rules or permit conditions.

Hazardous Air Pollutants

This permit does not provide information that characterizes the emissions of hazardous air pollutants (HAPS) from this facility. This information can be obtained from the reissuance application and the facility's AB-2588, Air Toxics "Hot Spots", Report referenced at the bottom of the "Permitted Emissions Table". For Outer Continental Source (OCS) sources, not subject to AB-2588, HAP emissions information is included in the permit reissuance application and is maintained by the stationary source.

TABLE NO. 4

| VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT | | | | | | | | | | |
|---|---------------|--------------|-------------|-------------|---------------|-----------------|--------------|-------------|-------------|---------------|
| Permit to Operate No. 00990 | | | | | | | | | | |
| Permitted Emissions | | | | | | | | | | |
| M:\Title V\TV permits\PO0990\Permit III\00990-201-Tables 2,3 & 4.xls | TONS PER YEAR | | | | | POUNDS PER HOUR | | | | |
| Equipment | ROC | NOx | PM | SOx | CO | ROC | NOx | PM | SOx | CO |
| Sespe Compressor Plant | | | | | | | | | | |
| 1 - 906 BHP Waukesha NG Engine (SN 17230) NSCR | 3.08 | 2.11 | 0.22 | 0.01 | 176.13 | 1.21 | 0.83 | 0.09 | 0.01 | 69.48 |
| 1 - 906 BHP Waukesha NG Engine (SN 192297) NSCR | 2.84 | 2.06 | 0.21 | 0.01 | 197.69 | 1.14 | 0.83 | 0.09 | 0.01 | 79.82 |
| 1 - 906 BHP Waukesha NG Engine (Unknown) OOS | 3.07 | 2.01 | 0.21 | 0.01 | 153.66 | 1.27 | 0.83 | 0.09 | 0.01 | 63.53 |
| 1 - 262.5 MMBTU/Hr Mactronic Waste Gas Flare | 6.36 | 8.35 | 0.61 | 0.07 | 45.45 | 13.60 | 17.85 | 1.31 | 0.15 | 97.13 |
| 1 - 105 BBL Condensate Tank (T-101) VR | 0.02 | | | | | <0.01 | | | | |
| 1 - Glycol Dehydrator System consisting of: | | | | | | | | | | |
| 1 - Glycol Dehydrator Vent VR | 4.66 | | | | | 1.06 | | | | |
| 1 - 0.5 MMBTU/HR NG Glycol Reboiler UNC | 0.01 | 0.21 | 0.02 | <0.01 | 0.18 | <0.01 | 0.05 | <0.01 | <0.01 | 0.04 |
| Total Permitted Emissions | 20.04 | 14.74 | 1.27 | 0.10 | 573.11 | 18.28 | 20.39 | 1.58 | 0.18 | 310.00 |
| HAP Emissions Ref.: AB 2588 Air Toxics Report Reporting Year 2003 Submittal Date: 2/18/05 | | | | | | | | | | |

5. OIL WELL LIST

This permit authorizes the operation of a maximum number of wells for the production of oil or natural gas. This section of the permit contains a list of the wells currently authorized to be operated. When changes to the list are made, the permit holder is required to maintain a copy of the revised oil well list at the facility and to submit a copy of the revised oil well list to the District.

A revision to this permit is required prior to adding a well that is newly drilled to the oil well list or prior to increasing the number of wells on the oil well list. Other revisions to the oil well list will not require a revision to this permit.

Section No. 8, "Permit Specific Conditions", includes a condition that limits the maximum number of producing wells at this stationary source. If applicable, Section No. 8 also includes a condition that requires best available control technology (BACT) on specific wells that were subject to Rule 26, "New Source Review".

Ventura County Air Pollution Control District

OIL WELL LIST

Permit to Operate No. 00990

The following oil wells are on permit:

None

6. EXEMPT EQUIPMENT LIST

Rule 33.2.A.3 (Part 70 Permits - Application Contents) requires the applicant to provide a list of all emissions units located at the stationary source that are exempt pursuant to Rule 23 based on size or production rate. Pursuant to Rule 33.2.A.3, emissions from insignificant activities do not need to be included in the permit application.

This section of the permit contains a table entitled "Insignificant Activities (Exempt Equipment)". This table is a list of insignificant activities (exempt equipment) at the facility that are exempt from permit based on a size or production rate exemption in Rule 23, "Exemptions From Permit". Insignificant Activity is defined in Rule 33.1 (Part 70 Permits – Definitions). The permittee shall provide calculations, usage records, emission records, and/or operational data as necessary to substantiate an activity as insignificant.

This table is presented for informational purposes only. Any changes to this list are not considered to be permit modifications, nor is the list considered to be enforceable. As detailed in Rule 33.2.A.3, this list is required to be submitted with an application for permit reissuance. The general requirements listed in Section No. 9 of this permit may apply to these insignificant activities.

Ventura County Air Pollution Control District
INSIGNIFICANT ACTIVITIES (EXEMPT EQUIPMENT)
Part 70 Permit No. 00990

| INSIGNIFICANT ACTIVITIES (EXEMPT EMISSION UNITS) | BASIS FOR EXEMPTION (Size/Production Rate) | RULE 23 CITATION |
|--|---|------------------------|
| Solvent Wipe Cleaning | Certified SCAQMD Clean Air Solvent or solvent with an ROC content < 25 mg/l | 23.F.10.a or 23.F.10.b |

7. SPECIFIC APPLICABLE REQUIREMENTS (ATTACHMENTS)

As discussed in Section No. 2, "Permitted Equipment and Applicable Requirements Table", the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are based on the District's prohibitory rules, federal NSPS (40 CFR Part 60), federal NESHAPS (40 CFR Part 61), and federal NESHAPS/MACT (40 CFR Part 63).

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No. or CFR No.) #" in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.

**Ventura County Air Pollution Control District
Rule 71.1.B.1.a Applicable Requirements
Tanks Equipped with Vapor Recovery**

Rule 71.1, "Crude Oil Production and Separation"

Adopted 06/16/92, Federally-Enforceable

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"

Adopted 03/10/98, Federally-Enforceable

Applicability:

This attachment applies to tanks at this stationary source equipped with a vapor recovery system which directs all vapors to a fuel gas system, a sales gas system, or to a flare. Specifically, this attachment applies to all storage tanks in a tank battery including wash tanks, produced water tanks, and wastewater separators, that are used in the production, gathering, storage, processing, and separation of crude oil and natural gas from any petroleum production permit unit prior to custody transfer. This attachment does not apply to portable tanks or other tanks not equipped with vapor recovery.

A tank is defined as a container, constructed primarily of nonearthen materials, used for the purpose of storing or holding petroleum material, or for the purpose of separating water and/or gas from petroleum material. A tank battery is defined as any tank or aggregation of tanks. An aggregation of tanks is considered a tank battery only if the tanks are located so that no one tank is more than 150 feet from any other tank, edge to edge.

The tank's hatches and other inlet and outlet liquid and gas piping connections are considered to be components subject to the leak requirements of APCD Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".

Conditions:

1. Pursuant to Rule 71.1.B.1.a, all tanks shall be equipped with a properly installed, maintained and operated vapor recovery system. The vapor disposal portion of the vapor recovery system shall consist of either a system which directs all vapors to a fuel gas system, a sales gas system, or to a flare that combusts reactive organic compounds.
2. Pursuant to Rule 71.1.D.2, the vapor recovery provisions of Rule 71.1.B.1.a shall not apply during maintenance operations on vapor recovery systems or tank batteries, including wash tanks, produced water tanks and wastewater separators, if the Air Pollution Control District is notified verbally at least 24 hours prior to the maintenance operation and if the maintenance operation will take no more than 24 hours to complete.

3. The tank's hatches and other inlet and outlet gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".
4. On a quarterly basis, permittee shall monitor the storage tank vapor recovery system to ensure that compliance with Rule 71.1.B.1.a is being maintained. This shall include an inspection of the following components, as applicable, for proper operation: gas compressor, hatches, relief valves, pressure regulators, flare. Permittee shall keep dated records of the quarterly inspections and tank maintenance activities. These records shall be maintained at the facility and submitted to the District upon request.
5. On an annual basis, permittee shall certify that storage tanks at the facility are complying with Rule 71.1.B.1.a. This annual compliance certification shall include verifying that the tanks are equipped with a vapor recovery system.

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Ventura County Air Pollution Control District
Rule 71.5.B.1.a.1 Applicable Requirements
Glycol Dehydrators
Closed Pipe Control System to Fuel Gas or Sales Gas System

Rule 71, "Crude Oil and Reactive Organic Compound Liquids"

Adopted 12/13/94, Federally-Enforceable

Rule 71.1, "Crude Oil Production and Separation"

Adopted 06/16/92, Federally-Enforceable

Rule 71.5, "Glycol Dehydrators"

Adopted 12/13/94, Federally-Enforceable

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"

Adopted 03/10/98, Federally-Enforceable

Applicability:

This attachment applies to all glycol dehydrators, regardless of size, anywhere natural gas is dehydrated. The glycol contacts and absorbs the water vapor in the gas and becomes rich glycol. This glycol is then regenerated by distilling the water. The distilled or lean glycol is then recycled back to the absorber. The glycol regenerator vent exhausts the water vapor, aromatic hydrocarbons and other reactive organic compounds (ROC) from the rich glycol distillation.

More specifically, this attachment applies to glycol dehydrators with regenerator vents that are controlled with a condenser/vapor disposal system. This attachment applies to control systems that use a closed pipe collection system that condenses ROC emissions and directs all vapors to a fuel gas system or sales gas system.

In addition to being subject to APCD Rule 71.5, "Glycol Dehydrators", the glycol reboiler portion of the glycol dehydrator is also subject to APCD Rule 74.15.1, "Boilers, Steam Generators, and Process Heaters", if it utilizes a natural gas-fired reboiler with a heat input rating of 1.00 MMBTU per hour, or greater; or to APCD Rule 74.15, "Boilers, Steam Generators, and Process Heaters", if it utilizes a natural gas-fired reboiler with a heat input rating of 5.00 MMBTU per hour, or greater.

Conditions:

1. Pursuant to Rule 71.5.B.1.a.1, no person shall operate a gas dehydration system unless the reactive organic compound (ROC) emissions from the glycol regenerator vents are controlled by a condenser/vapor disposal system that collects and condenses ROC

emissions and directs all uncondensed ROC emissions to a vapor recovery/disposal system. The vapor disposal portion of the system shall consist of a system that directs all vapors to a fuel gas system or a sales gas system.

2. Pursuant to Rule 71.5.B.2, the condensed hydrocarbon liquid stream from the glycol dehydration vents shall be stored and handled in a manner that will not cause or allow the evaporation of ROC into the atmosphere, except as allowed by Section D, "Exemptions", of APCD Rule 71.1, "Crude Oil Production and Separation".

3. Pursuant to Rule 71.5.B.3, the emission control system shall be maintained in a leak-free condition.

As detailed in Rule 71.B.14, a "gas leak" exists when a reading in excess of 10,000 ppm, as methane, above background, is obtained using an appropriate portable hydrocarbon analyzer and when sampling is performed according to the procedures specified in EPA Method 21 - Appendix A of 40 CFR Section 3.2.1. A "liquid leak" exists when the dripping of liquid containing reactive organic compounds at a rate of more than three (3) drops per minute is observed.

4. The glycol dehydrator emission control system's inlet and outlet gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities". Compliance with Rule 74.10 at the glycol dehydrator ensures compliance with the leak-free condition requirement of Rule 71.5.B.3.

5. Pursuant to Rule 71.5.D.1, the operator of any glycol unit subject to Rule 71.5 shall maintain a current file of the information necessary to assist with rule compliance and shall submit this information to the District upon request. This information, at a minimum, shall include the following:

- a. Facility name, APCD permit number
- b. Location, size of glycol dehydrator reboiler (MMBTU/hr), amount of gas dehydrated (MMSCFD) and type of glycol used
- c. Description of any installed ROC control system
- d. Flow diagram of dehydrator and any ROC controls
- e. Maintenance records of the ROC control system

6. Permittee shall annually certify the glycol dehydrator emission control system to ensure that compliance with Rules 71.5.B.1.a.1, 71.5.B.2, and 71.5.B.3 is being maintained. This annual certification shall include a visual inspection assuring that the glycol dehydrator emission control system is a closed system, that the tank storing the condensed hydrocarbon liquid is a closed tank, and that the glycol unit is leak free.

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Ventura County Air Pollution Control District
Rules 74.9.B.1 and 74.9.B.2 Applicable Requirements
Stationary Natural Gas-Fired Rich-Burn Internal Combustion Engines
Emission Limits After January 1, 1997
Three 906 BHP Waukesha Internal Combustion Engines

Rule 74.9, "Stationary Internal Combustion Engines"
Federally-Enforceable Version Adopted 11/14/00
District-Enforceable Version Adopted 11/08/05

This permit attachment lists the requirements for the November 8, 2005 version of the rule. Compliance with this attachment will ensure compliance with both versions of Rule 74.9. The permit conditions below, therefore, are federally enforceable. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

40 CFR Part 64, "Compliance Assurance Monitoring"
Federally-Enforceable

Applicability:

This attachment applies to the three (3) 906 BHP Waukesha, natural gas-fired rich-burn engines. These engines are each equipped with non-selective catalytic reduction system to comply with the limitations of Rule 74.9, "Stationary Internal Combustion Engines". A rich-burn engine is defined by Rule 74.9 to be a two or four-stroke spark-ignited engine where the manufacturer's original recommended operating air/fuel ratio divided by the stoichiometric air/fuel ratio is less than or equal to 1.1.

The emissions of nitrogen oxides (NO_x) from these engines are also subject to the monitoring requirements of 40 CFR Part 64, "Compliance Assurance Monitoring" (CAM). In addition to the quarterly inspections and annual source tests required by Rule 74.9, daily monitoring is required by 40 CFR Part 64. This attachment requires that a portable emissions analyzer be used to monitor NO_x emissions on a daily basis. The portable emissions analyzer shall be an indicator of compliance and a reading outside the compliance range will be an excursion as defined in 40 CFR Part 64.

Conditions:

1. Pursuant to Rules 74.9.B.1 and 74.9.B.2, emissions from each engine shall not exceed the following limits:
 - a. Nitrogen Oxides (NO_x expressed as NO₂), Either:
 1. 25 ppmvd referenced at 15% oxygen; or

2. A 96% reduction by volume, as measured concurrently across an emission control device.
- b. Reactive Organic Compounds (ROC): 250 ppmvd referenced at 15% oxygen, expressed as methane
- c. Carbon Monoxide (CO): 4500 ppmvd referenced at 15% oxygen

Compliance with this condition shall be verified by a biennial source test, conducted in accordance with Condition No. 2.

2. Pursuant to Rule 74.9.B.4, the permittee shall perform a biennial source test on each engine utilizing the following methods as detailed in Rule 74.9.G:

- | | | |
|----|----------------------------|--------------------------------|
| a. | NOx | ARB Method 100 |
| b. | CO | ARB Method 100 |
| c. | ROC | EPA Method 25 or EPA Method 18 |
| d. | Oxygen Content | ARB Method 100 |
| e. | Gaseous Fuel Heating Value | ASTM Method D1826-77 |

Source test data point intervals for ARB Method 100 tests shall be no greater than 5 minutes and data points shall be averaged over 15 consecutive minutes. Prior to conducting a biennial emissions test, the permittee shall notify the District Compliance Division. Written notification shall be received no less than 15 calendar days prior to the test. The emissions test report and results shall be submitted to the District Compliance Division within 45 days after the test.

3. Pursuant to Rule 74.9.B.5, the permittee shall perform a screening analysis of NOx and CO emissions on a quarterly basis at each engine unless:
 - a. The biennial source test specified above is required, or
 - b. The engine operated less than 32 hours in each of the three months of the applicable quarter, as measured by a non-resettable elapsed operating hour meter.

The permittee shall notify the District Compliance Division by telephone 24 hours prior to any quarterly screening analysis.

4. Pursuant to Rule 74.9.C, the permittee shall maintain a District approved Engine Operator Inspection Plan. The plan shall include a specific emission inspection procedure to assure that each engine is operated in continual compliance with the provisions of Rule 74.9. The procedure shall include an inspection schedule. At a minimum, inspections shall be conducted quarterly unless the engine operated less than 32 hours in each of the three

months of the applicable quarter, as measured by a non-resettable elapsed operating hour meter.

The plan shall be updated after any change in operation. For new engines or modifications to existing engines, the plan shall be submitted to and approved by the District prior to issuance of the Permit to Operate.

5. Pursuant to Rule 74.9.E, Recordkeeping Requirements, the operator shall maintain an inspection log for each engine containing, at a minimum, the following data:
 - a. Identification and location of each engine subject to Rule 74.9;
 - b. Date and results of each screening analysis and inspection,
 - c. A summary of any emissions corrective maintenance taken, and
 - d. Any additional information required in the Engine Operator Inspection Plan.

For each engine exempt from quarterly screening analysis and quarterly inspection for operation less than 32 hours in each of the three months of the applicable quarter, the permittee shall record total hours of operation each month.

6. Pursuant to Rule 74.9.F, Reporting Requirements, the Annual Compliance Certification shall include the following information:
 - a. Engine manufacturer, model number, operator identification number, and location.
 - b. A summary of maintenance reports during the renewal period, including quarterly screening data if applicable.
7. In addition to the above source testing and engine inspection requirements, the permittee shall comply with the monitoring requirements of 40 CFR Part 64, "Compliance Assurance Monitoring", as follows:
 - a. The exhaust stack of each engine shall be equipped with a sampling port or other sampling location to allow the placement of a sampling probe downstream of the non-selective catalytic reduction system.
 - b. On a daily basis, the permittee shall measure and record the concentration of nitrogen oxides and oxygen in the exhaust of each operating engine using a portable emissions analyzer. The concentration of nitrogen oxides, expressed as nitrogen dioxide, shall be measured in parts per million by volume on a dry basis (ppmvd) corrected to 15% oxygen. The portable analyzer may also be installed at a fixed location near the engines' exhausts in order to provide the required daily readings. The manufacturer and model of the portable emissions analyzer shall be subject to District approval.

- c. A nitrogen oxides concentration of greater than 25 ppmvd at 15% oxygen as measured by the portable emissions analyzer shall be considered an excursion as defined in 40 CFR Part 64. An excursion is defined as “a departure from an indicator range established for monitoring” in 40 CFR Part 64. Upon detecting such an excursion, the permittee shall inspect the engine and non-selective catalytic reduction system, make repairs or adjustments as necessary, and restore the engine exhaust emissions to less than 25 ppmvd at 15% oxygen as expeditiously as practicable in accordance with good air pollution control practices.
- d. The portable emissions analyzer shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s specifications and recommendations. On a biennial basis for each engine, the measured concentrations of nitrogen oxides of the portable analyzer shall be compared to the concentrations of nitrogen oxides as measured by ARB Method 100 as described in Condition No. 2 above. If this biennial ARB Method 100 testing indicates that an engine is exceeding the nitrogen oxide limits of Condition No. 1.a (Rule 74.9.B.1 and Rule 74.9.B.2) above when the portable emissions analyzer does not indicate an excursion, the permittee shall promptly notify the District and report this situation as a deviation from a Part 70 permit requirement.
- e. In addition to the records required by Condition No. 5 (Rule 74.9.E) above, the permittee shall maintain records of portable emissions analyzer readings for each engine including the date, time, nitrogen oxides concentration in ppmvd corrected to 15% oxygen, and for excursions as defined above, a summary of any corrective actions taken.
- f. In addition to the reports required by Condition No. 6 (Rule 74.9.F) above, the permittee shall submit a written report to the District Compliance Division that includes the number and duration of excursions, the cause of the excursion (including unknown if applicable), and the corrective action taken.

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8. PERMIT SPECIFIC CONDITIONS (ATTACHMENTS)

As discussed in Section No. 2, “Permitted Equipment and Applicable Requirements Table”, the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are primarily based on Rule 26, “New Source Review” requirements (e.g., BACT and offset requirements), or Rule 29, “Conditions on Permits” requirements (e.g., throughput recordkeeping requirements, specific requirements that limit emissions, etc.). These requirements are in addition to the specific applicable requirements listed in Section No. 7.

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label “Attachment PO (Title V Permit No.) PC#” in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.

**Ventura County Air Pollution Control District
Additional Permit Requirements
Sespe Compressor Plant**

Rule 26, “New Source Review”

Rule 29, “Conditions on Permits”

Conditions applied pursuant to Rule 26 are federally enforceable and conditions applied pursuant to Rule 29 are District enforceable only.

Applicability:

This attachment applies to the Sespe Compressor Plant. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. In order to comply with the throughput and consumption limits of this permit, the permittee shall maintain monthly records of throughput and consumption as detailed in Section No. 3, “Permitted Throughput and Consumption Limit Table”, of this permit. The monthly records shall be summed for the previous 12 months. Throughput or consumption totals for any of these 12 calendar month rolling periods in excess of the specified limit shall be considered a violation of this permit. This is a general throughput and consumption recordkeeping condition and applies unless another throughput and consumption recordkeeping condition appears in this section of the permit. (Rules 26 and 29)
2. Pursuant to Rule 23.F.7, the use of solvents, in addition to the use of coatings, adhesives, lubricants, and sealants, for facility and building maintenance and repair is exempt from permit. However, the use of such materials by contractors for the maintenance and repair of process and industrial equipment is not exempt from permit pursuant to Rule 23.F.7, unless the material is exempted under another specific section of Rule 23. Pursuant to Rule 23.F.6, the use of non-refillable aerosol cans is exempt from permit. Pursuant to Rule 23.F.10, the use of cleaning agents certified by the SCAQMD as Clean Air Solvents (Rule 23.F.10.a) and the use of cleaning agents that contain no more than 25 grams per liter of ROC as used or applied, and no more than 5 percent by weight combined of methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, and chloroform (Rule 23.F.10.b), is also exempt from permit. This permit does not limit the usage of acetone. Acetone is exempt from permit and record keeping requirements, as it is not defined as a reactive organic compound.

In order to substantiate the solvent use exemptions listed above, the permittee shall maintain a list of all exempt solvents used at the stationary source and a reference to the specific permit exemption status.

(Rule 29)

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Ventura County Air Pollution Control District
Additional Permit Requirements
262.5 MMBTU/Hr Waste Gas Flare

Rule 26, “New Source Review”

Conditions applied pursuant to Rule 26 are federally enforceable.

Applicability:

This attachment applies to the 262.5 MMBTU/Hr waste gas flare located at the Sespe Compressor Plant. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. The permittee shall maintain the following records for each use of the waste gas flare:
 - a. Date of each occurrence;
 - b. Duration of each occurrence;
 - c. Monthly quantity of gas combusted; and
 - d. Reason for flaring.

(Rule 26)

2. The permittee shall maintain a monthly record of the volume (MMSCF) of gas combusted in the flare. Pursuant to Rule 23.A.4, safety flares exclusively used for emergency standby for the disposal of process gases in the event of unavoidable process upsets are exempt from permit and therefore, such emergency usage is exempt from the permitted throughput limit for the flare. The permittee shall maintain records which differentiate between emergency usage, and non-emergency usage which includes planned flaring events. The monthly records shall be summed for the previous 12 months. Flare gas combustion totals for any of these 12 calendar month rolling periods in excess of the specified limit shall be considered a violation of this permit. (Rule 26)

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**Ventura County Air Pollution Control District
Additional Permit Requirements
Waukesha Compressor Engines**

Rule 29, "Conditions on Permits"

Conditions applied pursuant to Rule 29 are District enforceable only.

Rule 74.9, "Stationary Internal Combustion Engines"

Federally-Enforceable Version Adopted 11/14/00

District-Enforceable Version Adopted 11/08/05

This permit attachment lists the requirements for the November 8, 2005 version of the rule. Compliance with this attachment will ensure compliance with both versions of Rule 74.9. The permit conditions below, therefore, are federally enforceable. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to the three 906 BHP Waukesha Rich Burn Compressor Engines. APCD Rule 29, "Conditions on Permits", Section B.1, requires the APCO to apply conditions to permits which will limit the amount of air contaminants that a stationary source may emit. Condition No. 1 limits the facility's pounds per hour permitted emissions. Condition No. 2 requires that any engine designated as "Out of Service" not be operated and not be connected to a fuel source. An "Out of Service" engine does not need to comply with the biennial source testing requirements of Rule 74.9. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. Each of the compressor engines, when operated, shall be operated at not more than 900 revolutions per minute, which corresponds to 906 BHP. (Rule 29)
2. Any engine designated as "Out of Service" (OOS) in Table Nos. 2, 3, and 4 of this permit is shut down, shall not be operated, and shall not be connected to the natural gas fuel source. An "Out of Service" engine is not required to comply with Rule 74.9 or the 40 CFR Part 64, "Compliance Assurance Monitoring" requirements as listed in Attachment 74.9N3-00990 (Section No. 7) of this permit.

In order to demonstrate that compliance with this condition is being maintained, the permittee shall annually certify that an engine designated as "Out of Service" is shut down, is not being operated, and is not connected to the fuel source. (Rule 74.9)

9. GENERAL APPLICABLE REQUIREMENTS (ATTACHMENTS)

The general applicable requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or activities. These requirements can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit or activity, provided that the scope of the requirement and the manner of its enforcement are clear. Examples of such requirements include those that apply identically to all emissions units at a facility (e.g., source-wide opacity limits), general housekeeping requirements, and requirements that apply identical emissions limits to small units (e.g., process weight requirements).

As detailed in the Title V Permit Reissuance Application, general applicable requirements that apply to this facility were determined. The permit conditions associated with each generally applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No.) ____" in the lower left corner of each attachment. Each attachment has an applicability section that describes the emissions units to which the attachment applies. Each attachment may apply to one or more of the emissions units listed in the Applicable Requirements Table of Section No. 2. Note that these general applicable requirements may also apply to emissions units not required to be listed in the permit, such as those that are short-term.

Ventura County Air Pollution Control District
Rule 50 Applicable Requirements
Opacity

Rule 50, "Opacity"

Adopted 04/13/04, Federally-Enforceable

Applicability:

This attachment applies to all emissions units at this stationary source.

Conditions:

1. Pursuant to Rule 50.A, permittee shall not discharge into the atmosphere from any single source whatsoever any air contaminants for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, or equivalent to 20% opacity and greater, unless specifically exempted by Rule 50.
2. Permittee shall perform routine surveillance and visual inspections to ensure that compliance with Rule 50 is being maintained. A record shall be kept of any occurrence of visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. These records shall include the date, time, and identity of emissions unit. If the visible emissions problem cannot be corrected within 24 hours, permittee shall provide verbal notification to the District within the subsequent 24 hours. These visible emissions records shall be maintained at the facility and submitted to the District upon request.
3. On an annual basis, permittee shall certify that all emissions units at the facility are complying with Rule 50. This annual compliance certification shall include a formal survey identifying the date, time, emissions unit, and verification that there are no visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. As an alternative, the annual compliance certification shall include a formal survey identifying the date, time, emissions unit, and verification that there are no visible emissions for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, or equivalent to 20% opacity and greater, as determined by a person certified in reading smoke using EPA Method 9, or any other appropriate test method as approved in writing by the District, the California Air Resources Board, and the U.S. Environmental Protection Agency.

4. Upon District request, opacity shall be determined during routine surveillance and during the annual compliance certification by a person certified in reading smoke using EPA Method 9 or a certified, calibrated monitoring system.

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**Ventura County Air Pollution Control District
Rule 54 Applicable Requirements
Sulfur Compounds - Sulfur Emissions from
Combustion Operations at Point of Discharge**

Rule 54, "Sulfur Compounds"

Adopted 06/14/94, Federally-Enforceable

Rule 64, "Sulfur Content of Fuels"

Adopted 04/13/99, Federally-Enforceable

Applicability:

This attachment applies to all combustion emissions units at this stationary source that combust gaseous or liquid fuels. This attachment addresses the requirements of Rule 54 for sulfur emissions at the point of discharge. It can be demonstrated that compliance with the fuel sulfur content limits of Rule 64 ensures compliance with the sulfur emission limits of Rule 54.

Conditions:

1. Pursuant to Rule 54, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, in excess of 300 ppm by volume from any combustion operation, calculated as sulfur dioxide (SO₂) by volume at the point of discharge.
2. In order to comply with Rule 54, permittee shall comply with the fuel sulfur content limits of Rule 64. No additional periodic monitoring requirements for Rule 54 are required beyond the periodic monitoring requirements of Rule 64.
3. Upon District request, sulfur compounds at the point of discharge shall be determined by source testing using EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or South Coast AQMD Test Method 307-94 (Determination of Sulfur in a Gaseous Matrix), as appropriate.

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Ventura County Air Pollution Control District
Rule 54 Applicable Requirements
Sulfur Compounds - Sulfur Dioxide Concentration at Ground Level

Rule 54, "Sulfur Compounds"

Adopted 06/14/94, Federally-Enforceable

Applicability:

This attachment applies to all emissions units at this stationary source that emit sulfur compounds. This attachment addresses the requirements of Rule 54 for sulfur emissions at ground or sea level at or beyond the property line of the stationary source.

Conditions:

1. Pursuant to Rule 54, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, as sulfur dioxide which results in average ground or sea level concentrations at any point at or beyond the property line in excess of 0.25 ppmv averaged over any one hour period, or 0.04 ppmv averaged over any 24 hour period.
2. Permittee shall maintain a representative fuel analysis or exhaust analysis, along with modeling data or other demonstration to ensure that compliance with Rule 54 is being maintained. This analysis and compliance demonstration shall be provided to the District upon request.
3. Upon District request, ground or sea level concentrations of SO₂ shall be determined by Bay Area Air Quality Management District Manual of Procedures, Volume VI, Section 1, Ground Level Monitoring for Hydrogen Sulfide and Sulfur Dioxide with the following amendments:
 - a. The wind direction shall be continuously measured and recorded to within 5 degrees of arc, and wind speed shall be continuously measured and recorded to within 0.25 miles per hour (mph) at wind speeds less than 25 mph and with a threshold no greater than 0.2 mph.
 - b. The meteorological instruments and siting requirements shall comply with the guidelines in "Quality Assurance Handbook for Air Pollution Measurements Systems, Volume IV, Meteorological Measurements," EPA/600/4-90/003.
 - c. The gas standards shall be restandardized against the reference wet chemical method at a minimum of once every 12 months, or be standardized using National Institute of Standards and Technology (NIST) standard gases.

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Ventura County Air Pollution Control District
Rule 57.1 Applicable Requirements
Particulate Matter Emissions From Fuel Burning Equipment

Rule 57.1, "Particulate Matter Emissions From Fuel Burning Equipment"
Adopted 01/11/05, Federally-Enforceable

Applicability:

This attachment applies to fuel burning equipment such as boilers, steam generators, process heaters, water heaters, space heaters, flares, and gas turbines. This attachment does not apply to internal combustion engines, jet engine test stands and rocket engine test stands, and rocket propellant testing devices and rocket fuel testing devices. This attachment also does not apply to exhaust gas streams containing particulate matter that was not generated by the combustion of fuel; such exhaust gas streams are subject to Rule 52 and Rule 53.

Conditions:

1. Pursuant to Section B of Rule 57.1, emissions of particulate matter shall not exceed 0.12 pounds per million BTU of fuel input.

Particulate matter is defined as any material, except uncombined water, that exists in a finely divided form as a liquid or solid at standard conditions. Standard conditions are: a gas temperature of 68 degrees Fahrenheit (20 degrees Celsius) and a gas pressure of 14.7 pounds per square inch (760 mm. Hg) absolute.

2. Upon request of the District Compliance Division, compliance shall be determined by independent source test using CARB Method 5. The total particulate catch shall include the filter catch, probe catch, impinger catch, and the solvent extract, as specified in CARB Method 5. Any other appropriate test method may be used with prior written approval by the District, the California Air Resources Board, and the U.S. Environmental Protection Agency.
3. Periodic monitoring is not necessary to certify compliance with Rule 57.1. To certify compliance, a reference to the Rule 57.B District analysis dated December 3, 1997 is sufficient.

Ventura County Air Pollution Control District
Rule 64 Applicable Requirements
Sulfur Content of Fuels - Gaseous Fuel Requirements

Rule 64, "Sulfur Content of Fuels"

Adopted 04/13/99, Federally-Enforceable

Applicability:

This attachment applies to all combustion emissions units at this stationary source while the emissions units are combusting gaseous fuels. Rule 64 shall not apply to any flare gas combustion, where no useful energy is produced and which is subject to Rule 54, "Sulfur Compounds".

Conditions:

1. Pursuant to Rule 64, no person shall burn at any time gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel (788 ppmv), calculated as hydrogen sulfide at standard conditions, unless specifically exempted by Rule 64.
2. If only Public Utilities Commission-regulated natural gas, propane, or butane is combusted at this facility, it will be assumed that the permittee is complying with Rule 64 without additional periodic monitoring requirements. Any person claiming this exemption shall maintain records sufficient to substantiate the use of these fuels.
3. If other than Public Utilities Commission-regulated natural gas, propane, or butane is being combusted, the permittee shall analyze the sulfur content of the fuel on an annual basis using South Coast AQMD Method 307-94 - Determination of Sulfur in a Gaseous Matrix or by ASTM D1072-90 (1994), Standard Test Method for Total Sulfur in Fuel Gases.

Alternatively, when measuring the sulfur content of landfill or oilfield gaseous fuel, permittee may use the colormetric method ASTM D 4810-88 (Reapproved 1994) or the ASTM D4084-94 (Lead Acetate Reaction Rate Method) and may assume that the hydrogen sulfide content of the fuel gas adequately represents the total sulfur content. However, if the sulfur content as measured by ASTM D4810-88 or ASTM D4084-94 equals or exceeds 200 ppmv, then only South Coast AQMD Method 307-94 or ASTM D1072-90 (1994) shall be used to determine compliance.

The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis may be used subject to the verification of the dilution ratio.

Permittee may use the colormetric method ASTM D 4810-88 (Reapproved 1994) for the measurement of the sulfur content of gaseous fuels other than landfill or oilfield gas only if written approval has been granted by the District and by US EPA.

4. Monitoring of the sulfur content of landfill or oilfield gaseous fuel by the permittee shall be at least quarterly if any of the following conditions apply:
 - a. Any sulfur measurement exceeds 394 ppmv, calculated as hydrogen sulfide at standard conditions.
 - b. A stationary source is new.
 - c. The permittee has not reported historical measurements of hydrogen sulfide of the landfill or oilfield gaseous fuel performed within the previous three years in writing to the District for a stationary source.

An operator may have the sulfur content of landfill or oilfield gaseous fuel monitored annually only, instead of quarterly, by satisfying the following provisions:

- a. During four consecutive calendar quarters, each sulfur content measurement shall not exceed 394 ppmv, calculated as hydrogen sulfide at standard conditions, and
- b. Submit a written request to the District for a reduction in monitoring frequency. This request shall contain backup documentation including monitoring reports that document the above provision. Requests for a reduction in monitoring frequency are not effective until written approval by the District is received by the operator.

This annual fuel analysis, and the quarterly analyses if applicable, shall be maintained at the facility and a copy of the annual analysis shall be provided to the District with the annual compliance certification.

Ventura County Air Pollution Control District
Rule 71.1.C Applicable Requirements
Crude Oil Production and Separation - Produced Gas

Rule 71.1, "Crude Oil Production and Separation"

Adopted 06/16/92, Federally-Enforceable

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"

Adopted 03/10/98, Federally-Enforceable

Applicability:

This attachment applies to the emissions of produced gas from equipment used in the production, gathering, storage, processing, and separation of crude oil and natural gas from any petroleum production unit prior to custody transfer. Specifically, this attachment applies to gas collection systems that are hard-piped and closed systems that direct all produced gas to a fuel or sales gas system or to a flare.

Conditions:

1. Pursuant to Rule 71.1.C.1, the emissions of produced gas shall be controlled at all times using a properly maintained and operated closed system that directs all gas, except gas used in a tank battery vapor recovery system, to one of the following:
 - a. A fuel or sales gas system
 - b. A flare that combusts reactive organic compounds
2. Pursuant to Rule 71.1.C.2, the provisions of Rule 71.1.C.1 shall not apply to wells which are undergoing routine maintenance, or to exploratory wells (during the first two weeks of production) if the composition of the produced gas is unknown (i.e., new reservoir) and there are no existing gas handling systems within 150 feet of the well.
3. Permittee shall annually certify the produced gas collection system to ensure that compliance with Rules 71.1.C.1 is being maintained. This annual certification shall include a visual inspection assuring that the produced gas collection system is a closed system.
4. If a flare is used to control the produced gas, permittee shall inspect the flare on a quarterly basis to ensure that it is operating properly. A record of these inspections shall be maintained at the facility and shall be submitted to the District upon request.

5. The gas collection system's gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities". Compliance with Rule 74.10 at the gas collection system ensures compliance with the maintenance requirements of Rule 71.1.C.1.

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Ventura County Air Pollution Control District
Rule 71.4.B.1 Applicable Requirements
First Stage Sump Prohibition

Rule 71.4, "Petroleum Sumps, Pits, Ponds, and Well Cellars"
Adopted 06/08/93, Federally-Enforceable

Applicability:

This attachment applies to any first stage production sump at this stationary source. A first stage production sump is a sump that receives a stream of petroleum material directly from wells or a field gathering system. A sump is a receptacle, formed primarily of earthen materials, although it may be lined with artificial materials. A sump is further defined as "in continuous use for separating oil, water, sand, or other material in petroleum production operations".

Conditions:

1. Pursuant to Rule 71.4.B.1, no person shall install, maintain, or operate a first stage production sump. A first stage production sump is a sump that receives a stream of petroleum material directly from wells or a field gathering system.
2. In order to ensure that compliance with Rule 71.4.B.1 is being maintained, permittee shall annually certify that there are no first stage production sumps at the facility.

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Ventura County Air Pollution Control District
Rule 74.6 Applicable Requirements
Surface Cleaning and Degreasing

Rule 74.6, "Surface Cleaning and Degreasing"
Adopted 11/11/03, Federally-Enforceable

Applicability:

This attachment applies to all solvent cleaning activities at this stationary source, except those activities listed in Condition No. 11 that are exempt pursuant to Section E of Rule 74.6. This attachment does not apply to substrate surface preparation regulated by other APCD surface coating, adhesive, ink, resin, and solvent rules. "Solvent" is defined as any ROC-containing liquid used to perform solvent cleaning. "Solvent cleaning" is defined as the use of organic solvent to remove loosely held uncured adhesives, uncured inks, uncured coatings, uncured resins, and other contaminants which include, but are not limited to, dirt, soil, lubricants, coolant, moisture, grease, and fingerprints, from parts, tools, machinery, equipment, and general work areas.

This attachment also contains requirements, pursuant to Rule 74.6, for cold cleaners. A cold cleaner is defined in Rule 74.6 as any batch operated equipment designed to contain liquid solvent that is operated below the solvent's boiling point to carry out solvent cleaning operations. A specific type of cold cleaner is a "remote reservoir cold cleaner" which is a device in which solvent is moved through a sink-like work area for cleaning parts and drains immediately, without forming a pool, through a single drain hole less than 100 square centimeters (15.5 square inches) in area into an enclosed container that is not accessible for soaking parts. The freeboard height for remote reservoir cold cleaners is the distance from the top of the solvent drain to the top of the tank.

This attachment does not apply to solvent cleaning where an emission control system is used pursuant to Rule 74.6.B.5 or where an alternative cleaning system is used pursuant to Rule 74.6.B.6. Pursuant to APCD Rule 23.F.7, solvents used by the permittee for facility, ground, and building maintenance and repair are exempt from the requirement to have a permit. However, unless exempted by Rule 74.6.E, such solvents are required to comply with Rule 74.6.

Conditions:

1. Pursuant to Rule 74.6.B.1, no person shall perform solvent cleaning using solvent that exceeds the following limits:
 - a. Solvents used for application equipment cleanup, and all other cleanup of uncured coatings, adhesives, inks, or resins, shall not exceed an ROC content of 900 grams per liter and an ROC composite partial pressure of 33 mmHg at 20°C, as applied.

- b. Solvents used for cleaning of electronic components, electrical apparatus components, medical devices, or aerospace components shall not exceed an ROC content of 900 grams per liter and an ROC composite partial pressure of 33 mmHg at 20°C, as applied.
 - c. Solvents used for cleaning for purposes other than those listed in (a) and (b) above shall not exceed an ROC content of 25 grams per liter, as applied.
2. Pursuant to Rule 74.6.B.2, no person shall perform solvent cleaning using a solvent with an ROC content greater than 25 grams per liter unless one of the following cleaning devices or methods is used:
- a. Wipe cleaning where solvent is dispensed to wipe cleaning materials from containers that are kept closed to prevent evaporation, except while dispensing solvent or replenishing the solvent supply;
 - b. Non-atomized solvent flow, dip, or flush method where pooling on surfaces being cleaned is prevented or drained, and all solvent runoff is collected in a manner that enables solvent recovery or disposal. The collection system shall be kept closed to prevent evaporation except while collecting solvent runoff or emptying the collection system;
- If the cleaning method has a solvent capacity more than one gallon, a cold cleaner or remote reservoir cold cleaner meeting the equipment and operating requirements of Condition Nos. 8, 9, and 10 of this attachment (Sections C and D of Rule 74.6) shall be used to comply with this requirement.
- c. Application of solvent from a hand held spray bottle, squirt bottle or other closed container with a capacity of one liter or less;
 - d. A properly used enclosed gun washer or low emission spray gun cleaner.
3. Pursuant to Rule 74.6.B.3.a, no person shall allow liquid cleaning solvent to leak from any equipment or container.
4. Pursuant to Rule 74.6.B.3.b, no person shall specify, solicit, supply, or require any cleaning solvent or solvent cleaning equipment intended for uses governed by Rule 74.6 if such use would violate Rule 74.6. This prohibition applies to all written and oral contracts under which solvent cleaning operations subject to Rule 74.6 are to be conducted at any location in Ventura County.
5. Pursuant to Rule 74.6.B.3.c, no person shall use more than one gallon per week of

solvents containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform, or any combination of these solvents, in a total concentration greater than 5 percent by weight, for cold cleaning except in a cold cleaner operated in accordance with National Emission Standards for Halogenated Solvent Cleaning, 40 CFR Parts 9 and 63, Subpart T, Sections 63.460 through 63.469 (Degreasing MACT Standards). Any person that uses the above solvent in quantities less than one gallon per week shall maintain records of the volume and formulation of such solvent on an as-used basis (recording use each day such material is used). Records shall be saved for at least five (5) years from the date of each record and shall be made available to District personnel upon request.

6. Pursuant to Rule 74.6.B.4.a, all ROC-containing solvents shall be stored in non-absorbent, non-leaking containers that shall be kept closed at all times except when filling or emptying.
7. Pursuant to Rule 74.6.B.4.b, waste solvent and waste solvent residues shall be disposed of in a manner conforming with Division 20, Chapter 6.5 of the California Health and Safety Code.
8. Pursuant to Rule 74.6.C.1, all cold cleaners, except remote reservoir cold cleaners, shall be equipped with the following devices:
 - a. A drying rack suspended above the solvent, or other facility for draining cleaned parts such that the drained solvent is returned to the cleaner.
 - b. A cover that prevents the solvent from evaporating when not processing work in the cleaner. If high volatility solvent is used, the cover must be a sliding, rolling, or guillotine (bi-parting) type that is designed to easily open and close, or it must be designed to be easily operated with one hand. A high volatility solvent is an unheated solvent with an ROC composite partial pressure of greater than 2 mmHg @ 20°C.
 - c. A freeboard height of at least 6 inches (15.2 centimeters), if low volatility solvent is used. A low volatility solvent is an unheated solvent with an ROC composite partial pressure of 2 mmHg or less @ 20°C.
 - d. At least one of the following control devices, if high volatility solvent is used:
 1. A freeboard height such that the freeboard ratio is at least 0.75.
 2. A water cover if the solvent is insoluble in and heavier than water.
 - e. A permanent conspicuous mark locating the maximum allowable solvent level that conforms with the applicable freeboard height requirement in Condition No. 8.c or 8.d.1.

- f. A permanent conspicuous label or sign summarizing the applicable operating requirements appropriate for cold cleaning operations.
9. Pursuant to Rule 74.6.C.2, remote reservoir cold cleaners shall be equipped with the following devices:
- a. A permanent conspicuous label or sign summarizing the applicable operating requirements appropriate for cold cleaning operations.
 - b. A sink-like work area that is sloped sufficiently towards the drain to preclude pooling of solvent.
 - c. A single drain hole, less than 100 square centimeters (15.5 square inches) in area, for the solvent to flow from the sink into the enclosed reservoir.
 - d. A freeboard height of at least 6 inches (15.2 centimeters).
 - e. A cover for the drain when no work is being processed in the cleaner and high volatility solvent is used. If low volatility solvent is used, a cover is not required.
10. Pursuant to Rule 74.6.D, any person who operates a cold cleaner shall conform to the following operating requirements:
- a. The operator shall drain cleaned parts of all solvent until dripping ceases to ensure that the drained solvent is returned to the cleaner.
 - b. Solvent agitation, where necessary, shall be achieved using pump recirculation, a mixer, or ultrasonics. Air agitation shall not be used.
 - c. If a solvent flow is utilized, only a solid fluid stream (not a fine, atomized, or shower type spray) shall be used.
 - d. The pressure of the solvent flow system shall be such that liquid solvent does not splash outside the container.
 - e. No person shall remove or open any required device designed to cover the solvent unless work is being processed in the cleaner or maintenance is being performed on the cleaner.
 - f. The cleaning equipment and emission control equipment shall be operated and maintained in proper working order.
 - g. The cleaning of porous or absorbent materials such as cloth, leather, wood, or rope is prohibited. This provision shall not apply to paper gaskets or paper filters.

11. Pursuant to Rule 74.6.E.1, Rule 74.6 (all requirements of this permit attachment) shall not apply to:

- a. Cleaning activities using Clean Air Solvent, or a solvent with an ROC-content no more than 25 grams per liter as applied. A "Clean Air Solvent" is a solvent certified by the South Coast Air Quality Management District as a Clean Air Solvent.
- b. The use of up to 160 fluid ounces of non-refillable aerosol cleaning products per day, per facility.
- c. Janitorial cleaning including graffiti removal.
- d. Cleaning carried out in vapor degreasers or motion picture film cleaning equipment.
- e. Any cleaning device or mechanism regulated by National Emission Standards for Halogenated Solvent Cleaning, 40 CFR Parts 9 and 63, Subpart T, Sections 63.460 through 63.469 (Degreasing MACT Standards).
- f. Cleaning operations subject to any of the following rules:
 - Rule 74.3, Paper, Fabric and Film Coating Operations
 - Rule 74.5.1, Petroleum Solvent Dry Cleaning
 - Rule 74.5.2, Synthetic Solvent Dry Cleaning
 - Rule 74.19, Graphic Arts Operations
 - Rule 74.19.1, Screen Printing Operations
 - Rule 74.21, Semiconductor Manufacturing
- g. Stripping of cured coating (e.g.; stripping), cured adhesive (e.g.; debonding, unglueing), cured ink, or cured resin.
- h. The use of solvent for purposes other than solvent cleaning activities.

12. Pursuant to Rule 74.6.E.2, Rule 74.6.B.1 (Condition No. 1 of this attachment) shall not apply to:

- a. Cleaning operations required to comply with any ROC content and/or composite vapor pressure limit in any of the following rules:
 - Rule 74.12, Surface Coating of Metal Parts and Products
 - Rule 74.13, Aerospace Assembly and Component Manufacturing Operations
 - Rule 74.14, Polyester Resin Material Operations
 - Rule 74.18, Motor Vehicle and Mobile Equipment Coating Operations
 - Rule 74.20, Adhesives and Sealants

Rule 74.24, Marine Coating Operations
Rule 74.24.1, Pleasure Craft Coating Operations
Rule 74.30, Wood Products Coatings

- b. Cleaning of ultraviolet lamps used to cure ultraviolet inks coatings, adhesives or resins.
- c. Cleaning of solar cells, laser hardware, scientific instruments, or high-precision optics.
- d. Cleaning conducted in laboratory tests and analyses including quality assurance/quality control applications, or bench scale or short-term (less than 2 years) research and development programs.
- e. Removal of elemental sodium from the inside of pipes and lines.
- f. Cleaning of mold release compounds from molds.
- g. Cleaning of tools used to cut or abrade cured magnetic oxide coatings.
- h. Cleaning of aerospace assembly and subassembly surfaces that are exposed to strong oxidizers or reducers such as nitrogen tetroxide, liquid oxygen or hydrazine.
- i. Cleaning of paper gaskets.
- j. Cleaning of clutch assemblies where rubber is bonded to metal by means of an adhesive.
- k. Cleaning of hydraulic actuating fluid from filters and filter housings.
- l. Removal of explosive materials and constituents from equipment associated with manufacturing, testing or developing explosives.
- m. Manufacturing cleaning of nuts and bolts designed for automotive racing applications, in a cold cleaner complying with Sections C and D of Rule 74.6 using solvent with an ROC content no more than 900 grams per liter and a ROC composite partial pressure no more than 5 mm Hg @ 20C.
- n. Cleaning of precision-lapped mechanical seals in pumps that handle liquefied gasses, in a cold cleaner complying with Sections C and D of Rule 74.6 using solvent with an ROC content no more than 900 grams per liter and a ROC composite partial pressure no more than 5 mm Hg @ 20C.

- o. Facilitywide use of less than 1 gallon per week of non-compliant solvent where compliant solvents are not available. Any person claiming this exemption shall maintain records of the volume and formulation of non-compliant solvent used on an as-used basis (recording use each day such material is used). Records shall be saved for at least five (5) years from the date of each record and shall be made available to District personnel upon request.
- 13. Pursuant to Rule 74.6.E.3, Rule 74.6 Sections B.1 and B.2 (Condition Nos. 1 and 2 of this attachment) shall not apply to aircraft engine gas path cleaning or stationary gas turbine gas path cleaning using solvent with an ROC content of 200 g/l or less, as applied.
- 14. Pursuant to Rule 74.6.F, the permittee shall maintain a current material list showing each ROC containing material used in solvent cleaning activities. The list shall summarize the following information:
 - a. Solvent name and manufacturer's description.
 - b. All intended uses of the solvent at the facility, classified as follows:
 - 1. Cleanup, including application equipment cleaning, or
 - 2. Cleaning of electronic components, electrical apparatus components, medical devices, or aerospace components, or
 - 3. Solvent used pursuant to an exemption in Rule 74.6.E (specify the exemption claimed).
 - c. The ROC content in units of grams per liter of material (and ROC composite partial pressure in units of mm Hg @ 20C, if applicable) of the solvent.
 - d. If the solvent is a mix of materials blended by the operator, a record of the mix ratio.

This information shall be made available to District personnel upon request.

- 15. Permittee shall maintain the above records and perform routine surveillance of the applicable solvent cleaning activities to ensure that compliance with Rule 74.6 is being maintained. Upon request of the District, compliance with Rule 74.6 shall be determined using the following methods:
 - a. Pursuant to Rule 74.6.G.1, the ROC content of materials shall be determined by EPA Test Method 24 (40 CFR Part 60, Appendix A).

- b. Pursuant to Rule 74.6.G.4, the identity of components in solvents shall be determined using manufacturer's formulation data or by using ASTM E168-67, ASTM E169-87, or ASTM E260-85.
- c. Pursuant to Rule 74.6.G.5, ROC composite partial pressure of a solvent shall be calculated using a widely accepted published source such as: Boublik, T., V. Fried and E. Hala, "The Vapor Pressure of Pure Substances," Elsevier Scientific Publishing Co., New York (1973), Perry's Chemical Engineers Handbook, McGraw-Hill Book Company, CRC Handbook of Chemistry and Physics, Chemical Rubber Publishing Company (1986-1987), and Lange's Handbook of Chemistry, John A. Dean, editor, McGraw-Hill Book Company (1985). The true vapor pressure of a component in a solvent mix may be determined by ASTM Method D2879-86. The ROC composite partial pressure of a solvent mix consisting entirely of ROC may be determined by ASTM Method D2879-86.
- d. Pursuant to Rule 74.6.G.6, the active and passive solvent losses from spray gun cleaning systems shall be determined using South Coast Air Quality Management District's "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems" dated October 3, 1989. The test solvent for this determination shall be any lacquer thinner with a minimum vapor pressure of 105 mm Hg at 20°C. The minimum test temperature shall be 15°C.
- e. Pursuant to Rule 74.6.G.7, initial boiling point of solvent shall be determined by ASTM 1078-78 or by using a published source such as listed in Rule 74.6.G.5.

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Ventura County Air Pollution Control District
Rule 74.10 Applicable Requirements
Components at Crude Oil and Natural Gas Production and Processing Facilities

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"

Adopted 03/10/98, Federally Enforceable

Applicability:

This attachment applies to the crude oil and gas production facilities, pipeline transfer stations, and to natural gas processing facilities, at this stationary source. This attachment summarizes the fugitive leak and leak inspection requirements of Rule 74.10.

A crude oil and gas production facility is defined as an onshore or offshore facility at which crude petroleum and natural gas production and handling are conducted, as defined in the SIC Code as Industry No. 1311, Crude Petroleum and Natural Gas. A pipeline transfer station is defined as a facility that handles the transfer or storage of crude oil in pipelines. A natural gas processing facility is defined as a facility engaged in the separation of natural gas liquids from field gas and/or fractionation of the liquids into natural gas products, such as ethane, propane, butane, and natural gasoline. Excluded from the definition are compressor stations, dehydration units, sweetening units, field treatment, underground storage facilities, liquefied natural gas units, and field gas gathering systems unless these facilities are located at a natural gas processing plant. This attachment does not apply to petroleum refineries.

Conditions:

1. Pursuant to Rule 74.10.B, the operator shall identify all leaking components that cannot be immediately repaired. This identification shall consist of readily visible labels, tags, or other such system approved by the APCO, in writing, that enables the District and the operator to locate and identify each leaking component. Identification tags and labels shall remain visible for at least one year from the date attached.

As detailed in Rule 74.10.K.14, a leak is defined as any major gas leak, minor gas leak, major liquid leak or minor liquid leak. A leak is not a gaseous emission from a pneumatic control valve if it occurs when the valve is in the act of opening or closing. As detailed in Rule 74.10.K.3, a component is defined as any valve, stuffing box, dump lever arm, open ended line, fitting, pump seal, compressor seal, pressure relief valve, diaphragm, hatch, sight glass or meter. As detailed in Rule 74.10.K.16, a leak repair is any corrective action taken for the purposes of reducing a component leak to the lowest achievable level or at least below 1,000 ppmv for gas leaks and three drops per minute for liquid leaks using the best modern practices.

2. Pursuant to Rule 74.10.C.1, hatches shall be closed at all times except during sampling, adding of process material through the hatch, or attended maintenance operations.
3. Pursuant to Rule 74.10.C.2, no person shall use a component that emits a major gas leak, major liquid leak or minor liquid leak and the applicable maximum leak threshold for that component category, as listed in Attachment 1 of Rule 74.10, has been exceeded at the facility in any calendar quarter. The provisions of Rule 74.10.C.2 shall not apply to components that are tagged and repaired in accordance with Rules 74.10.D and 74.10.F.

For the purpose of complying with the operating requirements in Rule 74.10.C.2, any fugitive emissions leak originating at a tank seam, broken pipe or any other nondesigned opening in a process unit shall be considered an "other component" leak for the purpose of Attachment 1 of Rule 74.10.

A major gas leak, major liquid leak, and minor liquid leak are defined in Subsections K.17, K.18, and K.20 of Rule 74.10, respectively.

4. Pursuant to Rule 74.10.D.1, at natural gas processing plants, operators shall inspect with or without instrumentation all accessible operating pump seals, compressor seals, and pressure relief valves in service for leaks or indications of leaks once during every operating shift or every eight-hour period, whichever is greater.
5. Pursuant to Rule 74.10.D.2, at oil and gas production facilities and pipeline transfer stations, operators shall inspect with or without instrumentation all operating pump seals, compressor seals, pressure relief valves in service, and polished rod stuffing boxes for leaks or indications of leaks as follows:
 - a. Inspection frequency at manned facilities shall be at least once per day except when operators do not report to work at a facility at any time during that day.
 - b. Inspection frequency at unmanned facilities shall be at least once per week.
6. Pursuant to Rule 74.10.D.3, any gaseous leaks or indications of gaseous leaks discovered by inspection, that cannot be immediately repaired, shall be measured using EPA Method 21. The operator shall perform this leak measurement as follows:
 - a. For leaks detected during normal business hours, the leak measurement shall be performed as soon as feasible but no later than 24 hours after detection. If this 24 hour deadline occurs on a weekend or holiday, then the deadline is shifted to the end of the next normal business day.
 - b. For leaks detected during holidays, weekends or after business hours, the leak measurement shall be performed as soon as feasible but no later than the end of

the next normal business day.

7. Pursuant to Rule 74.10.D.4, immediately after being placed into service, an operator shall inspect all new, replaced or repaired fittings, including flanges and threaded connections, for leaks using EPA Method 21.
8. Pursuant to Rule 74.10.D.5, operators shall inspect all components, except for the following, at least every calendar quarter for gaseous leaks using EPA Method 21.
 - a. Inaccessible components or unsafe to monitor components shall be inspected for leaks by the operator at least annually using EPA Method 21.
 - b. Threaded connections and flanges shall be inspected for leaks by the operator using EPA Method 21 annually, unless the operator has designated them in the Operator Management Plan as exempt from all inspection requirements and subject to a zero leak threshold.
9. Pursuant to Rule 74.10.D.6, a pressure relief valve shall be inspected using EPA Method 21 within 3 calendar days after every known pressure release.
10. Pursuant to Rule 74.10.D.7, upon detection, operators shall affix a visible, weatherproof tag to all leaking components awaiting repair. The tag shall remain affixed until the component is repaired free of leaks as shown by re-inspection.

If the leak is gaseous, the operator shall include the following on the tag: date and time of leak detection, date and time of leak measurement; and the concentration (ppmv) measured using EPA Method 21.

If the leak is liquid, the operator shall include the following on the tag: date and time of leak detection; and whether leak is minor or major.

A tag may also be some other system approved in writing by the APCO that demonstrates to District personnel that the operator has detected a component leak awaiting repair and contains all of the information required to be on tags by Rule 74.10.D.7.

11. Pursuant to Rule 74.10.D.8, notwithstanding the requirements of Rule 74.10.D.5, operators may inspect components annually instead of quarterly at a facility by satisfying all the following provisions, except that compressor seals, pressure relief valves, polished rod stuffing boxes, and pump seals shall not be eligible for this reduction in inspection frequency:
 - a. During 4 consecutive calendar quarters, successfully operate and maintain all components at the facility so that no more than 0.5 percent of the total

components inspected, excluding polished rod stuffing boxes, have liquid leaks or major gas leaks that have not been immediately repaired.

- b. A Notice of Violation from the District for a violation of Rule 74.10.C.2 was not received by the operator for the facility during the previous twelve months.
 - c. Submit a written request to the District for a reduction in inspection frequency. This request shall contain backup documentation including inspection reports that demonstrates that the above performance level in Rule 74.10.D.8.a has been achieved. Requests for a reduction in inspection frequency are not effective until written approval by the APCO is received by the operator.
12. Pursuant to Rule 74.10.D.9, an annual inspection frequency approved in Rule 74.10.D.8 shall revert to the inspection frequency specified in Rule 74.10.D.5 should the sum of liquid leaks and major gas leaks, not including leaks from polished rod stuffing boxes, exceed 0.5 percent of the total components inspected per inspection period or should the operator receive a Notice of Violation from the District for violation of Rule 74.10.C.2 for that facility.
13. Pursuant to Rule 74.10.E.1, each operator shall submit an Operator Management Plan to the APCO for approval. If the APCO fails to respond to the Plan in writing within 90 days after it has been received, then it shall be deemed approved. No provision in the Plan, approved or not, shall conflict with or take precedence over any provision of this rule. The Plan shall identify any component exempt from this rule or part of this rule, and describe the procedures which the operator intends to use to comply with the requirements of this rule. The Plan shall include:
- a. Establishment of a data base of every leaking component that cannot be immediately repaired. The following parameters shall be included:
 - 1) Identification number, name or code.
 - 2) Component type, process unit and location.
 - 3) Dates found leaking and repair description for each leak found.

This identification provision is for inspection, repair, replacement and recordkeeping purposes.

- b. Identification of critical process units.
- c. Identification of components for which exemption from Rule 74.10 is being claimed under Rule 74.10.G.1. Gaseous streams and liquid streams, exempted by

Rule 74.10, Subsections G.1.a, G.1.b, G.1.c, or G.1.e shall be verified by analysis of the ROC concentrations, and the results of such analyses shall be included.

- d. Identification of liquid streams or components for which exemption is being claimed from the operator inspection requirements under Rule 74.10.G.3. The results of any testing used to qualify a stream for exemption shall be included.
 - e. Whether flanges or threaded fittings are exempt from all inspection requirements and subject to a zero leak threshold or whether flanges or threaded fittings are subject to annual inspection requirements and a one percent leak threshold as specified in Attachment 1 of Rule 74.10.
 - f. The inspection schedule to be followed.
 - g. Identification and description of any known hazard which may affect the safety of APCD personnel.
 - h. Identification of unmanned production facilities, if applicable.
14. Pursuant to Rule 74.10.E.2, the operator shall be required, upon written request by the APCO, to re-qualify, by analysis, the exemption(s) from the rule or part of the rule (Rule 74.10.G.1 and 74.10.G.3) if the exemption(s) may no longer be valid based on the changed composition of the process stream. The results of that analysis and any modification to the Plan shall be submitted to the District within 90 calendar days after receipt of the District request.
15. Pursuant to Rule 74.10.E.3, if the exempt status of a component is affected by a revision to Rule 74.10, then the Plan shall be modified accordingly by June 10, 1998.
16. Pursuant to Rule 74.10.E.4, existing operator management plans shall be updated no later than September 10, 1998, to include any provision that is needed to show compliance with Rule 74.10.
17. Pursuant to Rule 74.10.E.5, beginning September 10, 1998, each operator shall submit to the APCO, for approval in writing, an annual report to update the Operator Management Plan by no later than January 30 of each year. This report shall include any changes to exemptions, inspection schedule, or any other changes to the inspection and maintenance program. If no changes to the Plan have occurred over the past 12 months, then the operator shall indicate this in the annual report.

If the APCO fails to respond to the Plan update in writing within 90 days after it has been received, then it shall be deemed approved. No provision in the Plan, approved or not, shall conflict with or take precedence over any provision of Rule 74.10.

18. Pursuant to Rule 74.10.F.1, the operator shall minimize all component leaks immediately if feasible but no later than 1 hour following detection during normal business hours. Component leaks detected during holidays, weekends and after business hours shall be immediately minimized if feasible but not later than the next normal business day.
19. Pursuant to Rule 74.10.F.2, any noncritical component found leaking shall be replaced or repaired to a leak free condition, within the time periods in Table 1 of Rule 74.10. For gaseous leaks, the repair period shall start at the time of leak measurement. For liquid leaks, the repair period shall start at the time of leak detection. If the Table 1 deadline for repairing any major gas leak or any liquid leak falls on a Saturday, Sunday or holiday, then the deadline shall be shifted to the next normal business day.
20. Pursuant to Rule 74.10.F.3, the operator shall re-inspect repaired or replaced components for leaks as soon as practicable using EPA Method 21, but not later than one calendar month after the date on which the component is repaired.
21. Pursuant to Rule 74.10.F.4, any component leak identified by District personnel shall be repaired and inspected as required by Rule 74.10.F.
22. Pursuant to Rule 74.10.F.5, any open-ended line found to be leaking shall be sealed with a blind flange, cap, plug, or a second closed valve at all times except during operations requiring process fluid flow through the open-ended line or valve. If a second closed valve is used, the process side valve shall be closed first, after the completion of any operations requiring flow through the open-ended valve.
23. Pursuant to Rule 74.10.F.6, for major gas leaks (>50,000 ppm) or major liquid leaks from any critical compressor seal, pump seal, pressure relief valve or valve that cannot be repaired within the repair periods set forth in Table 1 of Rule 74.10, the operator shall replace or retrofit the leaking component with Best Available Control Technology (BACT) equipment, as approved by the APCO in writing, within one year from the date of leak detection, or during the next critical process unit shutdown, whichever occurs first.

For gas leaks less than or equal to 50,000 ppm or minor liquid leaks from critical components, or for leaks from critical components other than compressor seals, pump seals, pressure relief valves or valves, the owner or operator shall successfully repair or replace all leaking components within one year from leak detection or during the next critical process unit shutdown, whichever occurs first.

The operator shall notify the District in writing within 3 months after detecting a major gas leak (> 50,000 ppm) or major liquid leak from a critical compressor seal, pump seal, pressure relief valve, or valve if such leak cannot be repaired within the repair periods set

forth in Table 1 of Rule 74.10.

24. Pursuant to Rule 74.10.F.7, for a compressor seal, pump seal, pressure relief valve or valve that emits a total of 5 major leaks within a continuous 12 month period, the operator shall replace or retrofit the leaking component with BACT equipment, as approved by the APCO in writing, within one year from date of leak detection. The operator shall notify the District in writing within 3 months after a compressor, pump, pressure relief valve, or valve has had 5 major leaks in the previous 12 months.
25. Pursuant to Rule 74.10.G.1, the requirements of Rule 74.10 shall not apply to the following components that are verified in the Operator Management Plan:
 - a. Components, not at natural gas processing plants, with gaseous streams with ROC concentrations of 10 percent, by weight or less.
 - b. Components at natural gas processing plants with gaseous streams with ROC concentrations of one percent, by weight or less.
 - c. Components, not at natural gas processing plants, in liquid service, with ROC concentrations of 10 percent, by weight or less.
 - d. Underground components.
 - e. Components exclusively handling fluids if the fluid weight evaporated is 10 percent or less at 150 degrees Celsius.
26. Pursuant to Rule 74.10.G.2, the operator inspection requirements of Rule 74.10.D shall not apply to the following components. All other requirements of this rule shall still apply.
 - a. Pump seals, compressor seals, and pressure relief valves that are equipped with a closed-vent system to a vapor recovery system. The vapor disposal portion of the vapor recovery system shall consist of one of the following:
 - 1) A system which directs all vapors to a fuel gas system, a sales gas system, or a flare that combusts ROC.
 - 2) Any other system that processes all vapors and has a ROC vapor destruction or removal efficiency of at least 90 percent, by weight.
 - b. One-half inch and smaller stainless steel tube fittings that have been determined to be leak-free.

- c. Components in vacuum service.
 - d. Flanges or threaded connections that are designated in the Operator Management Plan as subject to the zero leak threshold specified in Attachment 1 of Rule 74.10.
27. Pursuant to Rule 74.10.G.3, the operator inspection requirements of Rule 74.10, Subsections D.1, D.2, D.4 and D.5 shall not apply to components that are inspected with or without instrumentation on a quarterly basis and are at oil and gas production facilities or pipeline transfer stations that handle liquids with the following properties and specified vapor recovery systems:
- a. Liquid having an API gravity of 20 degrees or less after the point of primary separation;
 - b. Liquid having an API gravity between 20 and 30 degrees which are located either:
 - 1) Downstream of a wellhead equipped with a casing vapor recovery system, provided that the vapor recovery system is operated at a pressure of less than 10 psig; or
 - 2) After the point of primary separation of oil and gas, provided the separation vessel is equipped with a vapor recovery system and is operated at a pressure of less than 25 psig.
28. Pursuant to Rule 74.10.G.4, an owner or operator may petition the APCO for exemption from the replacement or retrofit requirements in Rules 74.10.F.6 and 74.10.F.7 by submitting a cost evaluation for retrofitting or replacing a compressor, pump, pressure relief valve, or valve. Each petition shall include:
- a. A cost-effectiveness evaluation conducted in accordance with "BACT Cost-Effectiveness Procedures and Screening Levels for Costs," adopted by the Air Pollution Control Board on December 20, 1988. The cost analysis shall be based on the retrofit cost of the component if a retrofit is feasible. If the component cannot be retrofitted, then the following control option with the lower cost shall be used in the cost analysis:
 - 1) Component replacement with the lowest feasible cost BACT option.
 - 2) Enclosing the component seal and venting to a vapor recovery system.
 - b. Evidence of costs with written bids from vendors, published price lists, or other verifiable cost information. The potential emission reduction from the component retrofit/replacement shall be based on the ROC emissions over the previous 12

months. ROC emissions from a critical process unit shutdown shall be included if those emissions are associated with a critical leaking component. APCO-approved emission factors or source tests shall be used to quantify emissions.

29. Pursuant to Rule 74.10.H.1, any person subject to Rule 74.10 shall maintain an inspection log. The inspection log shall contain at least the following:
 - a. Location, type, description, and name or code of each leaking component inspected that cannot be immediately repaired, and name of associated operating unit.
 - b. For liquid leaks that cannot be immediately repaired: Date and time of leak detection and whether leak is major or minor.
 - c. For gaseous leaks that cannot be immediately repaired: Date and time of leak detection, date and time of leak measurement, analyzer reading (ppmv) of the leak, and whether the leak is major or minor.
 - d. Date that leak referenced in Rule 74.10.H.1.b or Rule 74.10.H.1.c is repaired to a leak-free condition, description of repair action, and date and emission level of re-check.
 - e. Identification of leak as critical if the component is critical.
 - f. Maintenance and calibration records of appropriate analyzer used in the EPA Method 21 measurements.
30. Pursuant to Rule 74.10.H.2, where a functional pressure relief has been detected, the operator shall record:
 - a. Location, operating unit identification, and date of detection.
 - b. Date of inspection of the pressure relief device after it was detected, and analyzer reading from EPA Method 21.
31. Pursuant to Rules 74.10.H.3 and 74.10.H.4, the inspection log shall be retained by the operator and shall be made available upon request to District personnel.
32. Pursuant to Rule 74.10.I.1, gaseous leaks from components shall be inspected or determined by EPA Method 21 by using an appropriate analyzer calibrated with methane. The calibration, maintenance, and operation of the appropriate analyzer shall follow the manufacturer's recommendations.

33. Pursuant to Rule 74.10.I.2, the ROC concentration, by weight, of process streams shall be measured by ASTM E168-88 (General Techniques of Infrared Qualitative Analysis), ASTM E169-87 (General Techniques of Ultraviolet Quantitative Analysis), or ASTM E260-85 (Gas Chromatography), or updated versions of these methods approved by EPA and published in the 40 CFR Part 60.
34. Pursuant to Rule 74.10.I.3, weight percentage of evaporated compounds of liquids shall be determined using ASTM Method D 86-82.
35. Pursuant to Rule 74.10.I.4, the API gravity of crude oil shall be determined using ASTM Method D287.
36. Pursuant to Rule 74.10.J, the failure of a person to meet any requirements of Rule 74.10 shall constitute a violation of Rule 74.10. Each leak exceeding the applicable maximum leak threshold in Attachment 1 of Rule 74.10 discovered by District personnel will be considered to be a violation.

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Ventura County Air Pollution Control District
Rule 74.11.1 Applicable Requirements
Rule 74.11.1, Large Water Heaters and Small Boilers

Rule 74.11.1, "Large Water Heaters and Small Boilers"

Adopted 09/14/99, Federally-Enforceable

Applicability:

This attachment applies to all water heaters, boilers, steam generators or process heaters (units) with a rated heat input capacity greater than 75,000 BTU/hr and less than or equal to 2,000,000 BTU/hr at this stationary source installed after December 31, 1999 (or after December 31, 2000 as discussed below) and to the future installation of any such unit at this stationary source.

Units with a rated heat input capacity greater than or equal to 1,000,000 BTU/hr are subject to the Authority to Construct and Permit to Operate requirements of Rule 10, "Permits Required".

Conditions:

1. Pursuant to Rule 74.11.1.B.1, after December 31, 2000, a person shall not sell, offer for sale, or install in Ventura County any new unit with a rated heat input capacity of greater than or equal to 75,000 BTU/hr and less than or equal to 400,000 BTU/hr that does not meet the following criteria:
 - a. Oxides of nitrogen emissions shall not exceed 40 nanograms per joule of heat output (93 pounds per billion BTU), or 55 parts per million, and
 - b. The unit is certified in accordance with Rule 74.11.1.C.
2. Pursuant to Rule 74.11.1.B.2, after December 31, 1999, a person shall not sell, offer for sale, or install in Ventura County any new unit with a rated heat input capacity of greater than 400,000 BTU/hr and less than or equal to 2,000,000 BTU/hr that does not meet the following criteria:
 - a. Oxides of nitrogen emissions shall not exceed 30 parts per million and carbon monoxide emissions shall not exceed 400 parts per million, and
 - b. The unit is certified in accordance with Rule 74.11.1.C.
3. Permittee shall maintain a listing of manufacturer, brand name, model number, and heat input rating for each water heater, boiler, steam generator and process heater, with a rated heat input capacity greater than 75,000 BTU/hr and less than or equal to 2,000,000

BTU/hr, at this stationary source. Permittee shall submit these identification records for all of these units to the District upon request.

4. On an annual basis, permittee shall certify that all water heaters, boilers, steam generators and process heaters, with a rated heat input capacity greater than 75,000 BTU/hr and less than or equal to 2,000,000 BTU/hr, at this stationary source are complying with Rule 74.11.1. This annual certification shall include a formal survey identifying each unit; whether it was installed before or after December 31, 1999 or December 31, 2000; and for those furnaces installed after December 31, 1999 or December 31, 2000, information indicating that the certification is contained on the unit's nameplate, or that the unit is included on a District-provided list of certified water heaters, boilers, steam generators and process heaters, with a rated heat input capacity greater than 75,000 BTU/hr and less than or equal to 2,000,000 BTU/hr.

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Ventura County Air Pollution Control District
Rule 74.22 Applicable Requirements
Rule 74.22, Natural Gas-Fired Fan-Type Central Furnaces

Rule 74.22, "Natural Gas-Fired Fan-Type Central Furnaces"

Adopted 11/09/93, Federally-Enforceable

Applicability:

This attachment applies to all natural gas-fired, fan-type central furnaces at this stationary source installed after May 31, 1994 and to the future installation of any natural gas-fired, fan-type central furnaces at this stationary source. A fan-type central furnace is a self contained space heater providing for circulation of heated air at pressures other than atmospheric through ducts of more than 10 inches in length that has a rated heat input capacity of less than 175,000 BTU per hour and, for combination heating and cooling units, a rated cooling capacity of less than 65,000 BTU per hour. Natural gas-fired, fan-type central furnaces installed in manufactured housing (mobile homes) are exempt from Rule 74.22.

Conditions:

1. Pursuant to Rule 74.22.B, no person shall install, after May 31, 1994, any natural gas-fired fan-type central furnace:
 - a. with NO_x (oxides of nitrogen) emissions in excess of 40 nanograms per joule of heat output. (74.22.B.1)
 - a. unless it is certified and identified in accordance with Section C of Rule 74.22. (74.22.B.2)
2. Permittee shall maintain a listing of manufacturer, brand name, model number, and heat input rating for each natural gas-fired fan-type central furnace at this stationary source. Permittee shall submit these identification records for all of these furnaces to the District upon request.
3. On an annual basis, permittee shall certify that all natural gas-fired fan-type central furnaces at this stationary source are complying with Rule 74.22. This annual certification shall include a formal survey identifying each natural gas-fired fan-type central furnace; whether it was installed before or after May 31, 1994; and for those furnaces installed after May 31, 1994, information indicating that the certification is contained on the furnace nameplate, or that the furnace is included on a District-provided list of certified furnaces.

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10. GENERAL REQUIREMENTS FOR SHORT-TERM ACTIVITIES (ATTACHMENTS)

The general requirements for short-term activities are broadly applicable requirements that apply to temporary activities at the facility (e.g., abrasive blasting, architectural coatings, degassing operations, etc.). These are activities occurring infrequently and for a short duration.

Requirements for short-term activities can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit, provided that the scope of the requirement and the manner of its enforcement are clear.

As detailed in the Title V Permit Reissuance Application, general applicable requirements for short-term activities that apply to this facility were determined. The permit conditions associated with each requirement for a short-term activity are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No.) ____" or "Attachment 40CFR61.M" in the lower left corner of each attachment.

Ventura County Air Pollution Control District
Rule 74.1 Applicable Requirements
Abrasive Blasting

Rule 74.1, "Abrasive Blasting"

Adopted 11/12/91, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving any abrasive blasting operation conducted at this facility. Abrasive blasting is the operation of cleaning or preparing a surface by forcibly propelling a stream of abrasive material against that surface. Abrasive materials subject to Rule 74.1 include, but are not limited to, sand, slag, steel shot, garnet or walnut shells.

Conditions:

1. Pursuant to Rule 74.1.B.1.a, all abrasive blasting operations shall be conducted within a permanent building, except for abrasive blasting operations conducted under one or more of the following conditions as detailed in Rule 74.1.B.1.b:
 - a. Steel or iron shot/grit is used exclusively
 - b. The item to be blasted exceeds eight feet in any dimension
 - c. The surface being blasted is situated at its permanent location or no further away from its permanent location than is necessary to allow the surface to be blasted
2. Pursuant to Rule 74.1.B.1.c, any abrasive blasting that is allowed to be conducted outside of a permanent building, and is not exclusively using steel or iron shot/grit, must use one of the following:
 - a. Wet abrasive blasting
 - b. Hydroblasting
 - c. Vacuum blasting
 - d. Dry blasting with California ARB certified abrasives
3. Abrasive blasting for pavement marking shall comply with the requirements of Rule 74.1.B.2.

4. Abrasive blasting of stucco and concrete shall comply with the requirements of Rule 74.1.B.3.
5. Packages or containers for abrasives certified in accordance with Section 92530 of the California Code of Regulations used for permissible outdoor blasting shall comply with the labeling requirements of Rule 74.1.B.4.
6. Abrasive blasting operations shall comply with the visible emission standards of Rule 74.1.C.1 and the nuisance prohibition of Rule 74.1.C.2. The visible emission evaluation of abrasive blasting operations shall be conducted in accordance with Section 92400 of the California Code of Regulations.
7. Permittee shall perform routine surveillance and visual inspections of the abrasive blasting operation to ensure that compliance with Rule 74.1 is being maintained. This routine surveillance shall include assuring that operation and equipment requirements are being met, and that there are no opacity violations.

In addition, for each abrasive blasting operation conducted at the facility, permittee shall maintain records of the following information:

- a. Date of operation
- b. Type of abrasive blasting media used
- c. Identity, size, and location of item blasted
- d. Whether operation was conducted inside or outside a permanent building
- e. California ARB certifications for abrasives used

These records shall be maintained at the facility and submitted to the District upon request.

Ventura County Air Pollution Control District
Rule 74.2 Applicable Requirements
Architectural Coatings

Rule 74.2, "Architectural Coatings"

Adopted 11/13/01, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving any person who supplies, sells, offers for sale, applies or solicits the application of any architectural coating at this stationary source. An architectural coating is a coating to be applied to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. Coatings applied in shop applications or to nonstationary structures, such as airplanes, ships, boats, railcars and automobiles, are not considered to be architectural coatings for the purposes of this rule, nor are adhesives.

This attachment and Rule 74.2 do not apply to architectural coatings that are sold in a container with a volume of one liter (1.057 quart) or less and do not apply to any aerosol coating product.

Conditions:

1. Pursuant to Rule 74.2.B.1, the volatile organic compound (VOC) content of architectural coatings shall not exceed the following standards, unless specifically exempted by Rule 74.2:
 - a. The VOC content of flat coatings shall not exceed 100 grams per liter of coating excluding water, exempt organic compounds, and any colorant added to tint bases;
 - b. The VOC content of nonflat coatings shall not exceed 150 grams per liter of coating excluding water, exempt organic compounds, and any colorant added to tint bases;
 - c. The VOC content of nonflat-high gloss coatings shall not exceed 250 grams per liter of coating excluding water, exempt organic compounds, and any colorant added to tint bases;
2. Pursuant to Rule 74.2.B.1, the VOC content of specialty architectural coatings shall not exceed the VOC limits in the Table of Standards in Rule 74.2, unless specifically exempted by Rule 74.2.

Specifically, the VOC content of industrial maintenance coatings shall not exceed 250 grams per liter of coating excluding water, exempt organic compounds, and any colorant added to tint bases.

3. Pursuant to Rule 74.2.B.4, all architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.
4. Pursuant to Rule 74.2.B.5, no person who applies or solicits the application of any architectural coating shall apply or solicit the application of any coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards in Rule 74.2.B.1.
5. Permittee shall perform routine surveillance of the architectural coating operation to ensure that compliance with Rule 74.2 is being maintained. Permittee shall specify the usage of compliant coatings and shall maintain VOC records of coatings used at the stationary source. This information shall be submitted to the District upon request.
6. The VOC content of architectural coatings, along with other specified physical and chemical properties, shall be measured using the testing procedures in Rule 74.2.G.

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Ventura County Air Pollution Control District
Rule 74.4.D Applicable Requirements
Cutback Asphalt - Road Oils

Rule 74.4, "Cutback Asphalt"

Adopted 07/05/83, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving the application of road oils for road, highway or street paving and maintenance. For the purpose of Rule 74.4, road oil shall be synonymous with slow cure asphalt.

Conditions:

1. Pursuant to Rule 74.4.D, road oils used for highway or street paving or maintenance applications shall contain no more than 0.5 percent of organic compounds which boil at less than 500°F as determined by ASTM D402.
2. Permittee shall sample and test oil being proposed for usage in order to ensure that compliance with Rule 74.4.D is being maintained. Permittee shall maintain records of oil analyses at the facility and submit these records to the District upon request.

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**Ventura County Air Pollution Control District
40 CFR Part 61, Subpart M Applicable Requirements
National Emission Standard for Asbestos**

**40 CFR Part 61, Subpart M, "National Emission Standard for Asbestos"
Federally-Enforceable**

Applicability:

This attachment applies to short term activities conducted at this facility pertaining to procedures for asbestos demolition or renovation activities as detailed in 40 CFR Part 61.145.

As defined in 40 CFR Part 61.141, asbestos means the asbestiform varieties of serpentinite (chrysotile), riebeckite (crocidolite), cummingtonite-grunerite, anthophyllite, and actinolite-tremolite. Renovation means altering a facility or one or more facility components in any way, including the stripping or removal of regulated asbestos containing material (RACM) from a facility component. Operations in which load-supporting structural members are wrecked or taken out are demolitions.

Conditions:

1. Permittee shall insure compliance with 40 CFR Part 61 Subpart M, "National Emission Standard for Asbestos". The owner or operator of a demolition or renovation activity, as defined in 40 CFR Part 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR Part 61.145, "Standards for Demolition and Renovation".
2. During times when asbestos renovation or demolition are underway at the facility, permittee shall ensure that all applicable requirements of 40 CFR Part 61.145 are met.

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11. GENERAL PERMIT CONDITIONS

This section contains general Part 70 permit conditions and general APCD permit to operate conditions. The general Part 70 permit conditions are associated with general federal requirements that apply to all Title V facilities. These conditions are based on APCD Rules 8, 30, 32, and 33, and 40 CFR Part 70.

The general permit to operate conditions are associated with general District requirements that apply to all operating Title V facilities. These conditions are based on APCD Rules 19, 20, 22, and 27.

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Ventura County Air Pollution Control District
General Part 70 Permit Conditions

1. The permittee shall comply with all federally-enforceable conditions of the Part 70 permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of an application for reissuance of the permit. (40 CFR 70.6(a)(6)(i), APCD Rule 33.3.B.1)
2. The permittee shall continue to comply with all the applicable requirements with which the company has certified that it is already in compliance. The permittee shall comply in a timely manner with applicable requirements that become effective during the permit term of this permit.
3. The permittee shall promptly report deviations from Part 70 permit requirements, including those attributable to upset conditions as defined in the Part 70 permit, the probable cause of the deviations, and any corrective actions or preventive measures taken. Promptly is defined as no later than four (4) hours after its detection by such owner or operator, or his agents or employees. (40 CFR 70.6(a)(3)(iii)(B), APCD Rule 33.3.A.3, APCD Rule 32.B.1)
4. The need to halt or reduce activity is not a defense. It shall not be a defense for a permittee in an enforcement action that it would be necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Part 70 permit. (40 CFR 70.6(a)(6)(ii), APCD Rule 33.3.B.2)
5. All required records, monitoring data, and support information shall be maintained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 permit. All applicable reports shall be submitted to the District every 6 months and shall be certified by a responsible official. Such reports shall identify any deviations from Part 70 permit conditions. (40 CFR 70.6(a)(3)(ii)(B), 40 CFR 70.6(a)(3)(iii)(A), APCD Rule 33.3.A.3)
6. The permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 permit or to determine compliance with the Part 70 permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the Part 70 permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of the EPA along with a claim of confidentiality. (40 CFR 70.6(a)(6)(v), APCD Rule 33.3.B.5)

7. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the District or an authorized representative to perform the following:
- a. Enter upon the permittee's premises where a Part 70 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the Part 70 permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the Part 70 permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Part 70 permit; and
 - d. As authorized by the federal Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the Part 70 permit or applicable requirements.

(40 CFR 70.6(c)(2), APCD Rule 8, APCD Rule 33.3.B.7)

8. The Part 70 permit may be modified, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (40 CFR 70.6(a)(6)(iii), APCD Rule 33.3.B.3)
9. A Part 70 permit shall be reopened under the following conditions:
- a. Additional applicable requirements under the federal Clean Air Act become applicable to the facility with a remaining Part 70 permit term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the Part 70 permit is due to expire, unless the original Part 70 permit or any of its terms and conditions has been extended pursuant to APCD Rule 33.6.D;
 - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator of the EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 permit;

- c. The District or EPA determines that the Part 70 permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 permit; or
- d. The Administrator of the EPA or the District determines that the Part 70 permit must be revised or revoked to assure compliance with the applicable requirements.

(40 CFR 70.7(f), APCD Rule 33.8.A)

- 10. All fees required by District Regulation III, Fees, shall be paid on a timely basis as requested by the District. Notwithstanding the term of the Part 70 permit, if the permittee fails to pay the annual renewal fees required pursuant to APCD Rule 42.H within the time period specified in APCD Rule 30, the Part 70 permit will be void. (40 CFR 70.6(a)(7), APCD Rule 30, APCD Rule 33.3.B.6)
- 11. The Part 70 permit does not convey any property rights of any sort, or any exclusive privilege. (40 CFR 70.6(a)(6)(iv), APCD Rule 33.3.B.4)
- 12. The provisions of this Part 70 permit shall be severable, and in the event of any challenge to any portion of the permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force. (40 CFR 70.6(a)(5), APCD Rule 33.3.B.8)
- 13. An application for reissuance of this Part 70 Permit shall be submitted no more than 18 months prior to the expiration date and no less than 6 months prior to the expiration date as stated on this permit. The application shall be subject to the same procedural requirements, including those for public participation and EPA review, that apply to initial Part 70 permit issuance. (40 CFR 70.5(a)(1)(iii), 40 CFR 70.7(c)(1)(i), APCD Rule 33.6.B)
- 14. Any Part 70 application and any document, including reports, schedule of compliance progress reports, and compliance certification, required by this Part 70 permit shall be certified by a responsible official. The certification shall state that, based on information and belief formed after a reasonable inquiry, the statements and information in the document are true, accurate, and complete (40 CFR 70.5(d), APCD Rule 33.9.C)
- 15. Permittee shall submit a certification of compliance with all applicable requirements and all Part 70 permit conditions. A compliance certification shall be submitted with any Part 70 permit application and annually, on the anniversary date of the Part 70 permit, or on a more frequent schedule if required by an applicable requirement or permit condition.

This compliance certification shall identify each applicable requirement or condition of the Part 70 permit, the compliance status of the stationary source, whether the compliance was continuous or intermittent since the last certification, and the method(s) used to

determine compliance. In addition, the certification shall indicate the stationary source's compliance status with any applicable enhanced monitoring and compliance certification requirement of the federal Clean Air Act. A copy of each compliance certification shall be submitted to EPA Region IX. (40 CFR 70.5(c)(9), 40 CFR 70.6(c)(5), APCD Rule 33.3.A.9, APCD Rule 33.9.B)

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**Ventura County Air Pollution Control District
General Permit to Operate Conditions**

1. Within 30 days after receipt of a permit to operate, the permittee may petition the Hearing Board, in writing, to review any new or modified condition on the permit. (APCD Rule 22)
2. This permit to operate, or a copy, shall be posted reasonably close to the subject equipment and shall be readily accessible to inspection personnel from the District. Posting a copy of the "Permitted Equipment and Applicable Requirements Table" contained in Section No. 2 will fulfill this requirement if the entire permit to operate is readily available at another location at the stationary source. (APCD Rule 19)
3. This permit to operate is not transferable from one location to another unless the equipment is specifically listed as being portable. (APCD Rule 20)
4. If, within a reasonable amount of time, any permittee refuses to furnish information requested by the District, the District may suspend this permit to operate. The permittee will be informed, in writing, of the permit suspension and the reasons for the suspension. (APCD Rule 27)

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12. MISCELLANEOUS FEDERAL PROGRAM CONDITIONS

This section contains miscellaneous federal program conditions that are not emission unit-specific or short-term. These federal requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or short-term activities. Permit conditions associated with these miscellaneous federal program requirements are listed in an individual attachments. The attachment is identified with the label "Attachment 40CFR(Part No.) __" in the lower left corner of each attachment.

**Ventura County Air Pollution Control District
40 CFR Part 82 Applicable Requirements
Protection of Stratospheric Ozone**

40 CFR Part 82, "Protection of Stratospheric Ozone"

40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners"

40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction"

Federally-Enforceable

Applicability:

This attachment applies to activities conducted at this facility that involve producing, importing, exporting, or consuming of the specified controlled substances described under 40 CFR Part 82.4. Specifically, this attachment includes the requirements of 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners", and 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction".

As defined in 40 CFR Part 82.30, 40 CFR Part 82, Subpart B applies to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

As defined in 40 CFR Part 82.150, 40 CFR Part 82, Subpart F applies to any person servicing, maintaining or repairing appliances, except for motor vehicle air conditioners. This subpart also applies to persons disposing of appliances, including motor vehicle air conditioners. An appliance is any device which uses a class I or class II substance as a refrigerant and which is used for household or commercial purposes, including any air conditioner, refrigerator, chiller, or freezer.

Conditions:

1. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners".

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

2. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee is subject to all of the applicable requirements as specified in 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction".

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**Ventura County Air Pollution Control District
40 CFR Part 68 Applicable Requirements
Accidental Release Prevention and Risk Management Plans**

**40 CFR Part 68, "List of Regulated Substances and Thresholds for Accidental Release Prevention"
Federally-Enforceable**

Applicability:

This attachment applies to regulated substances that are contained in a process at this facility and that exceed the threshold quantity, as presented in 40 CFR Part 68.130. This regulation addresses the requirements of section 112(r) of the federal Clean Air Act as amended. Specifically, this attachment applies to a facility that has stated that a federal Risk Management Plan pursuant to section 112(r) is currently not required, but where flexibility is desired to preclude a permit reopening should 40 CFR Part 68 become an applicable requirement.

Conditions:

1. Should the stationary source, as defined in 40 CFR Part 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in Part 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70.

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13. PART 70 PERMIT APPLICATION PACKAGE

The Part 70 permit application, which was submitted by this facility, is included in this section for reference only and is not a part of the Part 70 permit.

During the processing of the permit application, additional information was submitted by the facility in response to District requests. This additional information is included with the application. If the applicant was asked to replace a page or a portion of the application, the original submittal is stamped "REPLACED" and the replacement page or section is placed in front of the original. The applicant and District correspondence for the Part 70 permit application is located in the District permit file for this stationary source.

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